



June 18, 2024

U.S. Environmental Protection Agency
William J. Clinton Building
1200 Pennsylvania Ave, NW
Washington, DC 20460

Re: Support for California Transport Refrigeration Units Rule Amendments Authorization
Docket ID No. EPA-HQ-OAR-2024-0030

Dear Administrator Regan:

The undersigned California-based health and medical organizations urge the United States Environmental Protection Agency (EPA) to authorize California's implementation of the Transport Refrigeration Units (TRU) rule amendments.

Authorizing the TRU amendments will support California's ongoing need to reduce harmful air pollution. The American Lung Association's 25th annual "State of the Air" report that shows 98 percent of Californians continue to live in communities with failing grades for ozone and/or particle pollution. Six California cities rank in the top ten lists for the worst ozone and particle pollution. Decades of peer-reviewed literature have shown the wide range of harms posed by these pollutants.

Transportation sources, including TRUs subject to this rule, are a dominant source of regional air pollution burdens and climate pollution. They are also a dominant source of local diesel particle exposures in vulnerable, over-impacted communities. TRUs are often concentrated in neighborhood locations near homes, hospitals, schools, and other sensitive receptors.

Implementation of the 2022 rule amendments will reduce the use of climate-damaging refrigerants, smog-forming emissions, and toxic diesel particle exposures by transitioning TRU engines to zero-emission technologies over the next decade. The transition to zero-emission technologies for TRUs is estimated to provide significant public health benefits by 2034, including:

- \$1.75 billion in monetized public health benefits
- 177 lives saved

- Reductions in hospital admissions for cardiovascular and respiratory illnesses
- Avoided emergency room visits for asthma¹

These benefits will be achieved by cutting over 1,200 tons of PM_{2.5} and 3,500 tons of NO_x, according to the California Air Resources Board (CARB). These are only a portion of the estimated health benefits: the rule amendments are also estimated to reduce cancer risk to communities impacted by neighborhood-level TRU engine operations at cold storage facilities and grocery stores by 58-72% over the course of implementation. The monetized health benefits are more than double the compliance cost estimates of implementation, and that total doesn't include the reduced cancer risk.

The rule aligns with California's clean air and climate goals and is included in the 2022 State Implementation Plan to meet the national ambient air quality standards for ozone by reducing smog-forming emissions.

In the development of this rule, the CARB hosted robust workshops with community members and industry representatives, in multiple languages to ensure a transition plan to cleaner, zero-emission technologies for TRU engines that will improve health. The federal Clean Air Act provides California with the authority to enact more-health protective standards, and it requires EPA to authorize state standards that are at least as protective of public health as applicable Federal standards. We believe that the rule amendments respond to the urgent need to address California's air pollution challenges and meet the test for authorization.

In closing, we urge EPA to authorize California's Transport Refrigeration Units rule amendments to bring health benefits to all residents. We also urge EPA to approve all eight of California's waivers still pending that will provide life-changing health benefits to all Californians, but especially frontline communities.

Please contact William Barrett with the American Lung Association at William.Barrett@Lung.org for any additional information.

Sincerely,

Alliance of Nurses for Healthy Environments
American Lung Association
Asthma Coalition of Los Angeles County
Breathe California
California Nurses for Environmental Health and Justice
California Thoracic Society
Children Now
LifeLong Medical Care
Long Beach Alliance for Children with Asthma
Physicians for Social Responsibility/Sacramento
Public Health Advocates
Regional Asthma Management & Prevention
San Francisco Bay Physicians for Social Responsibility
St. John's Community Health

¹ California Air Resources Board. Proposed Amendments to Transportation Refrigeration Units Regulation, p. 138. July 2021.
<https://ww2.arb.ca.gov/sites/default/files/barcu/board/rulemaking/tru2021/isor.pdf>