



Northeast Region

August 18, 2023

State of Maine Board of Environmental Protection  
17 State House Station  
28 Tyson Drive  
Augusta, Maine 04333-0017

Dear Maine Board of Environmental Protection Members,

The National Waste & Recycling Association (“NWRA”) is a national trade association that is the voice for the private sector waste, recycling, and organics industry that is essential to maintaining the quality of life for all Maine residents. The delivery of waste and recycling services impacts all residential, commercial, and industrial properties on a daily basis.

NWRA members:

- Collect, process, and manage waste, recyclables, organics, and medical waste
- Operate and manage landfills in compliance with all federal and state laws
- Manage and service truck fleets and collection vehicles
- Design, manufacture, sell and service equipment and supplies
- Provide engineering and consulting services

The Northern New England Chapter members employ more than 2,000 Maine residents who hold all hold well paying jobs. This also includes responsibility for \$373,000 in state revenues. Nation-wide, it is estimated that the private sector waste and recycling industry account for more than one million jobs and generate nearly a quarter of a trillion dollars in U.S. GDP.

This letter is submitted in opposition to the Maine Department of Environmental Protection’s proposed update to the state’s Advanced Clean Truck Program Rule. While the proposed rule update which looks to adopt California’s Advanced Clean Truck Rule to accelerate sales of zero-emission vehicles in the state to help reduce greenhouse gas emissions is well-intentioned, it is completely impractical for a state like Maine.

NWRA is supportive of innovations taking place in the field of electric vehicles (EV); however, it also recognizes that the technologies for heavy-duty EVs like those utilized by the waste and recycling industry are not yet perfected, especially with regard to capacity issues. Furthermore, rear-load and roll-off collection EVs are not yet available on a significant enough scale to meet the logistical needs of our industry.

The average waste and recycling collection vehicle weighs approximately 33,000 pounds when empty. That number will vary based on the age of the vehicle and whether the truck is a roll-off or a front, side or rear loader. Depending on the type of vehicle,



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these trucks can carry between 20,000 and 30,000 pounds of waste. According to CNBC, a battery for a heavy-duty electric truck may weigh up to 16,000 pounds. This may add between 4,000 and 5,300 pounds to the overall weight of a collection vehicle over the weight of a traditional diesel-powered vehicle. For example, the gross vehicle weight of a City of New York Department of Sanitation EV collection truck is 72,000 pounds when its four lithium nickel manganese cobalt oxide batteries that power the vehicle are accounted for.

Due to the heavier truck weights caused by EV batteries, load sizes must be decreased to compensate for existing vehicle weight limits on roads and bridges. This has led some states to reevaluate the maximum gross weight of vehicles for those powered by alternative fuels.

The waste and recycling industry is ideal for electrification as its vehicles run consistent weekly routes with low daily miles, limited speeds, repetitive accelerating/braking and can fully recharge overnight when not in use. The weight of the batteries and existing road and bridge weight limits are two of the current main obstacles though.

Additionally, perfection of heavy-duty truck EV technology, especially when it comes to the capacity required by the waste and recycling industry, remains elusive for now. To the extent that any heavy-duty EVs are available, there are not enough of them on the market for purchase to fulfill the industry's requirements.

As states and localities encourage or in some cases move toward mandating the use of EV waste and recycling collection trucks, they must also consider these factors if they hope to maintain current levels of service and efficiency.

Based on the foregoing, NWRA respectfully requests that this above mentioned rule update not receive favorable consideration.

Sincerely,

*Lewis A. Dubuque*

Lewis A. Dubuque  
Vice President, Massachusetts Chapter  
National Waste & Recycling Association