

April 7, 2020

**VIA E-MAIL ([QFR@epw.senate.gov](mailto:QFR@epw.senate.gov))**

Chairman John Barrasso  
Senate Environment and Public Works Committee  
410 Dirksen Senate Office Building  
Washington, DC 20510

Ranking Member Tom Carper  
Senate Environment and Public Works Committee  
410 Dirksen Senate Office Building  
Washington, DC 20510

Dear Chairman Barrasso and Ranking Member Carper:

The Truck and Engine Manufacturers Association (EMA) represents the leading manufacturers of heavy-duty engines and commercial motor vehicles with a gross vehicle weight rating (GVWR) greater than 10,000 pounds. EMA member companies produce highly customized medium- and heavy-duty vehicles to perform a wide variety of commercial functions including long-haul interstate trucking, regional freight shipping, intracity pickup and delivery, refuse hauling, and construction -- to name a few. We are writing today to express concerns with S. 2754, the *American Innovation and Manufacturing (AIM) Act of 2019*. The bill would require the Environmental Protection Agency (EPA) to phase down the production and consumption of certain hydrofluorocarbons (HFCs), including HFC-134a, by 85 percent by 2036.

Heavy trucks come in a wide variety of shapes and sizes that utilize many unique heating, ventilation, and air conditioning (HVAC) systems for the driver's comfort. Heavy truck HVAC systems are designed for different truck cab sizes (including both day or sleeper cabs), different engines, and different chassis configurations. HVAC systems in heavy duty trucks exclusively utilize HFC-134a as the air conditioning refrigerant. The Environmental Protection Agency's (EPA's) Significant New Alternatives Policy (SNAP) identifies HFC-134a as *acceptable* for use in vehicles with a GVWR greater than 14,000 pounds. While passenger car manufacturers are in the process of converting their HVAC systems to use HFO-1234yf, EPA identifies that refrigerant as *unacceptable* for vehicles with a GVWR greater than 14,000 pounds.

Transitioning heavy trucks from HFC-134a to HFO-1234yf would require EMA member companies to invest significant amounts of capital and human resources in designing, developing, and validating many different HVAC systems for the new refrigerant. It could take more than five years to develop those HVAC new systems and have them ready for production in a truck manufacturer's extensive product line. We are concerned that the AIM Act could have significant negative impacts on the availability and cost of HFC-134a. Should the supply of HFC-134a become constricted, or the price significantly rise, truck manufacturers would be forced to begin the long and expensive process of transitioning the HVAC systems in their products to HFO-1234yf. However, before truck manufacturers and their HVAC component suppliers can begin the process

of transitioning to HFO-1234yf, EPA must change its designation of HFO-1234yf to acceptable for use in heavy vehicles.

Our membership would like to work constructively with the Committee to perfect S. 2754 to include some assurances that the phase down of HFC-134a will not negatively impact the ability of heavy truck manufacturers to cost-effectively provide products to their customers. If you have any questions, or would like additional information, please do hesitate to contact me at [tblubaugh@emamail.org](mailto:tblubaugh@emamail.org) or (312) 929-1972.

Very truly yours,

A handwritten signature in blue ink that reads "Timothy A. Blubaugh". The signature is written in a cursive style with a large, sweeping initial 'T'.

Timothy A. Blubaugh