



1550 Crystal Drive
Suite 804
Arlington, VA 22202
T 202.244.4700
F 202.966.4824

AUGUST 16, 2019

Via Electronic Transmission: www.regulations.gov

National Highway Traffic Safety Administration, U.S. Department of Transportation
U.S. Department of Transportation Docket Office
1200 New Jersey ave, S.E.
Washington, DC 20590

Re: Docket ID No. NHTSA-2019-0055

Dear Sir/Madam:

On behalf of the solid waste industry, the National Waste & Recycling Association (NWRA) is pleased to respond to National Highway Traffic Safety Administration (NHTSA) request for comments on the FMVSS Compressed Natural Gas Fuel Container Integrity Notice of Proposed Rule Making (NPRM), NHTSA-2019-0055. NWRA is a not-for-profit trade association representing private solid waste and recycling collection, processing, and management companies that operate in all fifty states.

NWRA applauds NHTSA for reducing the regulatory burden on our member companies, while not reducing safety. NWRA supports the NPRM modifying the periodic visual inspection interval for Compressed Natural Gas (CNG) fuel containers installed on vehicles with a GVWR greater than 4,536kg to at least every 12 months, based on the definitions for inspections provided by Natural Gas Vehicles for America, *Compressed Natural Gas Vehicle Fuel System Inspection Guidance*¹. NWRA would ask that NHTSA require the inspection be documented.

BACKGROUND

NWRA

¹ <https://www.ngvamerica.org/wp-content/uploads/2018/03/CNG-Vehicle-Fuel-System-Inspection-Guidance.pdf>

NWRA is the trade association representing the private sector waste and recycling industry that is essential to maintaining the quality of American life by protecting public health and the environment. The delivery of waste and recycling services impacts all residential, commercial, and industrial properties on a daily basis. Our 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.

The association's mission is to provide leadership, education, safety expertise, research, and advocacy to promote the waste and recycling industry. NWRA's goal is to ensure a climate where our members can continue to provide safe, economically sustainable, and environmentally responsible services and jobs that benefit communities throughout America.

NWRA's Safety Committee provides insights and best practices on how to prevent injuries to the industry's workers. The association convenes a number of institutes that provide leadership on landfills, recycling, and healthcare waste. The association also serves as Secretariat for the American National Standards Institute (ANSI) Z245 Standard for Equipment Technology and Operations for Wastes and Recyclable Materials. Along with our partner Informa, we collaborate on WasteExpo, North America's largest waste and recycling exposition and conference. Our educational offerings are known and respected around the world.

Our members operate in all 50 states and the District of Columbia. Waste and recycling facilities number nearly 18,000 scattered throughout the U.S., mirroring population centers. Our nearly 700 members are a mix of publicly-traded and privately-owned local, regional, and Fortune 500 national and international companies. NWRA represents approximately 70 percent of the private sector waste and recycling market.

The solid waste industry directly employs about 450,000 people as of May 2019. It is estimated that the private sector waste and recycling industry is responsible for sustaining more than one million jobs.

Waste and Recycling Industry Commercial Motor Vehicle Fleet

The private sector of the waste and recycling industry has a commercial motor vehicle (CMV) fleet of more than 100,000 collection trucks and an even greater number of CMV Drivers. These trucks are primarily Heavy-Duty Vehicles as defined by the Federal Highway Administration (FHWA) with a GVWR of more than 26,000 pounds. The industry's fleet includes, but is not limited to, waste and recycling collection trucks, roll-off trucks, post collection tractor trailers, container delivery, and grapple trucks.

Conclusion

NWRA appreciates the opportunity to provide comments on NHTSA's NPRM regarding the FMVSS Compressed Natural Gas Fuel Container integrity, NHTSA-2019-0055. NWRA supports the change to yearly inspections for CNG fuel containers. Should you have any questions about these comments, please contact Kirk Sander, VP of Safety and Standards for NWRA, at 202-364-3750 or e-mail at ksander@wasterecycling.org.

Very truly yours,

A handwritten signature in black ink that reads "Darrel K. Smith". The signature is written in a cursive style with a light grey background behind it.

Darrel K. Smith
President & CEO