



October 31, 2017

Tricia Treece
Arkansas Department of Environmental Quality
Epidemiology Supervisor
5301 Northshore Drive
North Little Rock, AR 72118-5317

VIA Email: treecep@adeq.state.ar.us

REF: BENEFICIARY MITIGATION PLAN (BMP) – VOLKSWAGEN MITIGATION TRUST

Dear Ms. Treece:

I am writing to submit Waste Management's comments regarding the portion of these above-mentioned funds to be used for private Class 8 fleets. We have a great story to tell about how much farther our trucks go towards reducing NOx, plus private fleets have to spend 75% of the costs, and that makes Arkansas' monies in this BMP go much further.

Should Waste Management be considered, our company will purchase natural gas powered vehicles (NGVs) with engines offering a 90% NOx reduction over the EPA's strictest emission standards, making them the cleanest commercially available technology.

NGVs are far more cost-effective in delivering emission reductions than other alternative fuel options, such as hybrid and electric vehicles.

Waste Management currently has **6,141** NGVs in our operations, and we are continually adding more.

NGVs are:

1. **Sustainable:** NGVs maximize long-term emission reductions.
2. **Responsible:** NGVs extend the funding and foster economic development.
3. **Available:** NGVs meet the diverse operating requirements of every fleet application.

Related Recommendations for Environmental Mitigation Trust (EMT) Funding

❖ **Ensure that funding incentivizes adoption by both public and private fleets**

- While it might be tempting to fund public vehicles at the 100% level, this will limit the total number of deployed vehicles and therefore lessen the overall emission reductions.
- Funding levels should be large enough to offset the incremental cost of new, cleaner vehicles, as well as to address the fact that replaced vehicles must be scrapped.

If I can be of any assistance to the Department regarding this or any other matter, please do not hesitate to call upon me.

Sincerely,

George Wheatley
Waste Management
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Cc: Governor Asa Hutchinson, State of Arkansas,
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