



The Groundwater Association

September 4, 2025

The Honorable Lee Zeldin
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

Subject: Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards; Docket ID No.: EPA-HQ-OAR-2025-0194

Dear Mr. Zeldin,

The National Ground Water Association (NGWA) appreciates the opportunity to comment on the proposed rule, "Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards".

NGWA supports this reconsideration of the GHG emission standards for light-, medium- and heavy-duty vehicles. In particular for NGWA members, this reconsideration embraces the fact that their groundwater-related services are typically local and their vehicles' emissions therefore are minimal in most cases.

Thank you for considering our comments in the attachment.

Sincerely,

A handwritten signature in black ink, appearing to read "T. Morse", is written over a light blue horizontal line.

Terry S. Morse, CAE, CIC
Chief Executive Officer
National Ground Water Association

Attachment: NGWA Comments on Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards

Attachment

NGWA Comments on: Environmental Protection Agency Proposed “Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards”

Published on: August 1, 2025

Comments Due: September 15, 2025

Code of Federal Regulations Reference: 40 CFR Parts 85, 86, 600, 1036, 1037, and 1039

Federal Register Citation: 90 FR 36288

Docket ID No.: EPA-HQ-OAR-2025-0194

Summary:

The EPA proposes to remove regulations in 40 CFR parts 85, 86, 600, 1036, and 1037 pertaining to the control of greenhouse gas emissions (GHG) from new light-, medium-, and heavy-duty (HD) vehicles and engines, including emission standards, test procedures, averaging, banking, and trading requirements (ABT), reporting requirements, and fleet-average emission requirements. Reasons identified for removing these regulations include: whether CO₂ and other GHG are air pollutants, consideration previously of pollutants at ground level, interference on setting of fuel economy standards, Presidential policy of addressing global climate change through voluntary actions and incentives, research and technology and the Supreme Court decision regarding agencies' interpretations of law going beyond the prescription of Congress.

As a result of these proposed changes, motor vehicle and engine manufacturers would no longer have future or current obligations for measurement, control, or reporting of GHG emissions for any vehicle, including for previously manufactured model-year vehicles.

The regulations were not specifically required by law and were increasing the cost of light, medium and heavy-duty trucks.

The EPA is proposing these changes to comply with limits on its statutory authority under the best reading of CAA section 202(a), to respond to legal and scientific developments that undermine the conclusions and assumptions of the 2009 Endangerment Finding addressing air emissions, and to realign Agency resources to prioritize core statutory responsibilities.

Link to the Proposal: <https://www.federalregister.gov/documents/2025/08/01/2025-14572/reconsideration-of-2009-endangerment-finding-and-greenhouse-gas-vehicle-standards>

National Ground Water Association Comments

The National Ground Water Association supports the relief from GHG emission control standards for light-, medium- and heavy-duty trucks. Our members serve the 42 million Americans who rely private water wells for safe and clean water, most of which live in small and often underserved rural communities. NGWA members also provide services to small, usually rural, public water systems serving 33 million Americans drawing on small municipal or community system water wells as well as to 93,000 individual schools, businesses, rural churches and institutions, and road-side businesses and rest areas on private wells. Typically, members' services, whether well drilling, well maintenance or groundwater-related field activities, involve short distances within a small area of 35 to 50 miles from their offices or starting points, with drill rigs averaging less than 5,000 miles/year. Once vehicles reach the service locations, their engines are routinely cut off during much of the jobs and day. Generally, water well vehicles are not used for long-distance travel compared to long-haul interstate freight carriers.

In the long-term, this action to rescind the GHG emission standards for light-, medium- and heavy-duty vehicles should aid in holding down the cost of services for these largely rural residents and their businesses.

NGWA supports addressing global climate change through voluntary actions and incentives, research and technology.

Basis for the National Ground Water Association Interest in This Proposed Rule

NGWA, the largest trade association of groundwater professionals in the world, represents over 10,000 groundwater professionals within the United States and internationally. NGWA represents four key sectors: water-well contractors, scientists and engineers, manufacturers and suppliers of equipment needed to make groundwater development and remediation possible. NGWA's mission is to advocate for and support the responsible development, management, protection and use of groundwater.

NGWA's position is that the federal government's role should be one of research, technology transfer, and funding assistance.

Thank you for the opportunity to comment on this proposed rule.



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