



# NC DAQ's analysis of EPA's proposed repeal of GHG Vehicle Emission Standards

Mike Abraczinskas, Director, NC DAQ

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*Department of Environmental Quality*



**ICYMI: EPA Launches the Largest Deregulatory Actions in U.S. History with Proposal to Rescind Obama-Era Endangerment Finding**

The EPA proposes gutting its greenhouse gas rules. Here's what it means for cars and pollution

**EPA moves to end climate regulation under Clean Air Act**

**Pulling the Critical Block: EPA's Repeal of the Endangerment Finding Could Topple Climate Rules**

# Background on the 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards

- **Section 202 of the Clean Air Act**
- **Endangerment Finding**
- **Cause and Contribute**
  
- **Light- and Medium-duty vehicle standards**
- **Heavy-duty vehicle standards**

# Summary of NC DAQ's Comments on EPA's Proposed Rulemaking – Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards

## EPA's Proposal:

- Repeal of 2009 Endangerment Finding and GHG vehicle standards.
- Removal of GHG standards for light-, medium-, and heavy-duty vehicles.
- EPA is not revisiting vehicle emission standards for criteria and toxic air pollutants.
- EPA's proposal does not quantify the real-world impact of removing GHG vehicle standards on criteria and toxic air pollutant emissions.



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## Historical context for setting vehicle emission standards:

- EPA previously used an integrated approach to set standards for multiple pollutants
  - CO<sub>2</sub> emissions - tied to fuel consumption and vehicle fuel efficiency
  - NO<sub>x</sub>, VOC, and PM<sub>2.5</sub> emissions depend on fuel consumption and emission control systems

## Legislative Change – “One Big Beautiful Bill Act”:

- Reset the maximum civil penalty for CAFE noncompliance to \$0.00
- Removed NHTSA's ability to enforce CAFE standards
- How will automakers respond?

*NHTSA = National Highway Traffic Safety Administration*  
*CAFE = corporate average fuel economy*



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## Potential Consequences:

- Eliminating GHG standards & CAFE enforcement would seem to necessarily lead to an increase in emissions of criteria and toxic air pollutants.
- This may jeopardize compliance with NAAQS.
- Could increase toxic air pollutant exposure in North Carolina.

## DAQ's request to EPA:

- Explain how EPA and NHTSA will coordinate to ensure:
  - No increase in criteria and toxic air pollutant emissions.
  - Compliance with Clean Air Act (CAA) anti-backsliding provisions, which protect foundational emission controls.

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## What are the criteria pollutant impacts of the proposal?

### EPA acknowledged in the preamble...

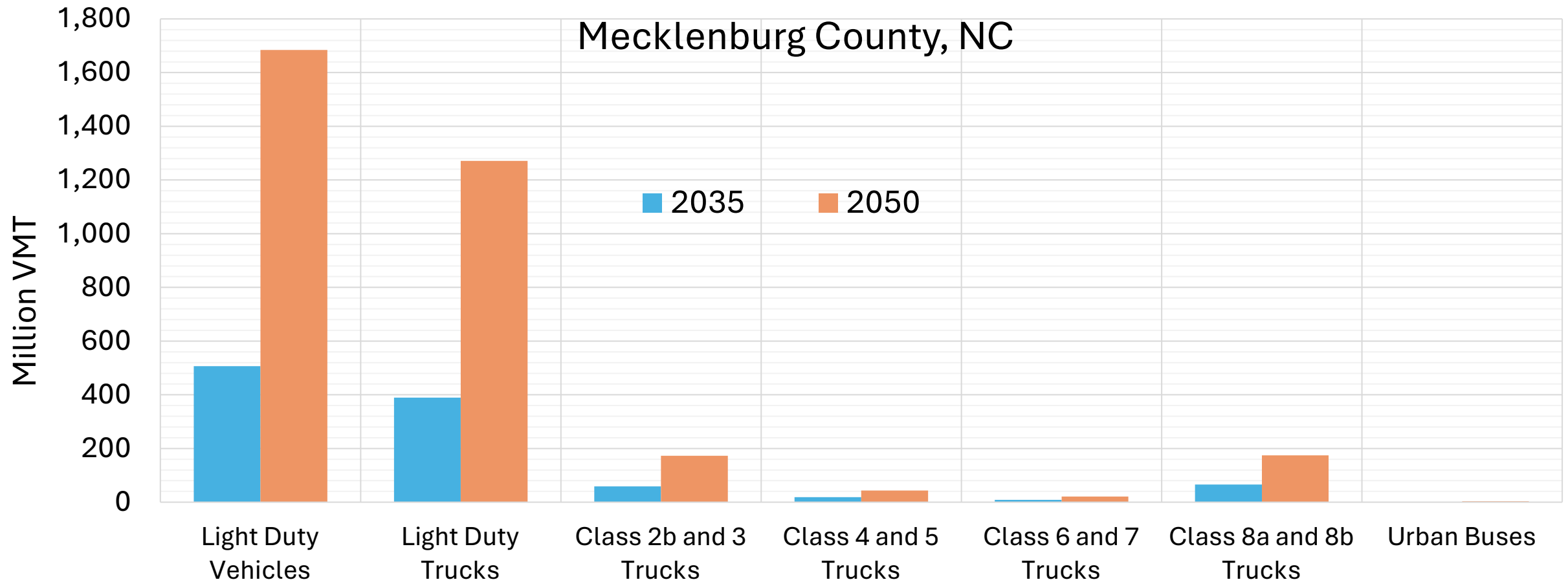
*“...the possibility that this proposal could marginally impact emissions of criteria pollutants and air toxics.”*

### AND... EPA does not...

*“believe that the proposed action would have a material adverse impact on the health of individuals with respect to non-GHG air pollutants, including on children, because the EPA anticipates that the impacts of repealing GHG emission regulations would have only marginal and incidental impacts on the emission of non-GHG air pollutants.”*

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Estimated Increase in Annual VMT from Fossil Fuel Vehicles in  
Mecklenburg County, NC



Total increases across all vehicle classes:

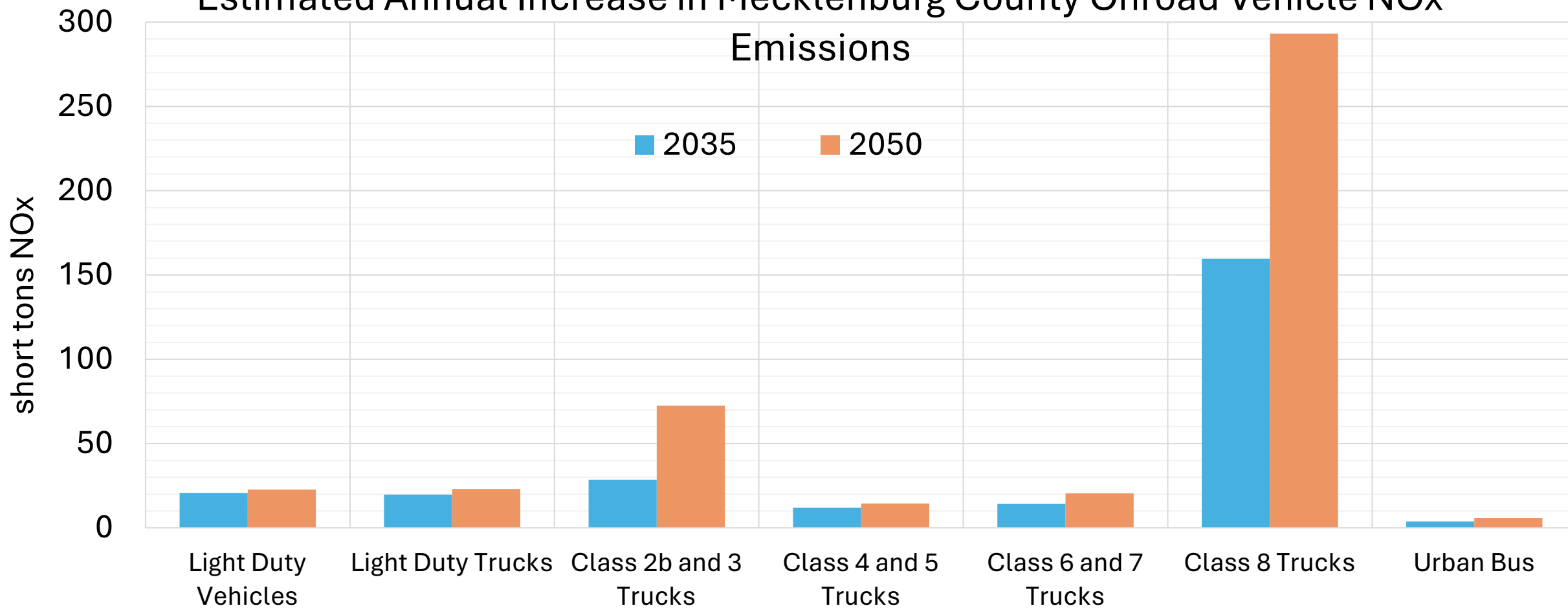
1.05 billion VMT in 2035

3.37 billion VMT in 2050



# Summary of NC DAQ's Comments on EPA's Proposed Rulemaking – Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards

Estimated Annual Increase in Mecklenburg County Onroad Vehicle NOx  
Emissions



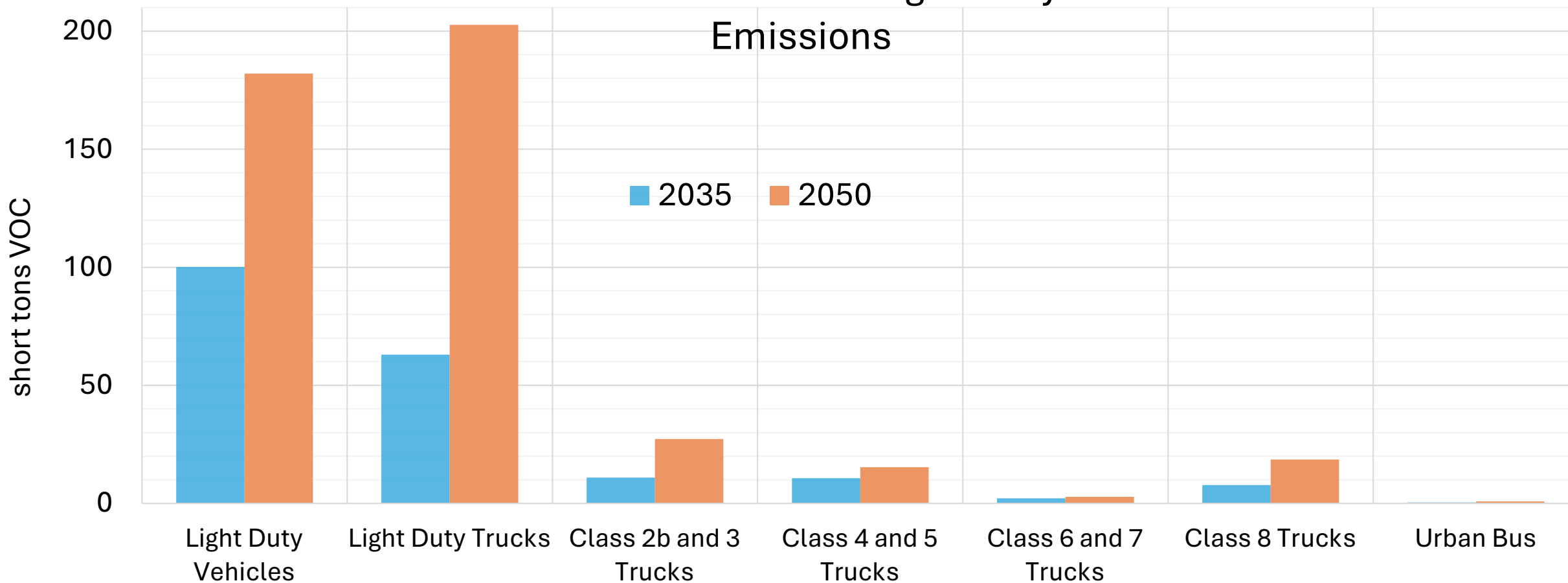
Total increases across all vehicle classes:

259 tons in 2035 (11.2%)

452 tons in 2050 (35.0%)

# Summary of NC DAQ's Comments on EPA's Proposed Rulemaking – Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards

## Estimated Annual Increase in Mecklenburg County Onroad Vehicle VOC Emissions



Total increases across all vehicle classes:

195 tons in 2035 (8.7%)

450 tons in 2050 (28.3%)

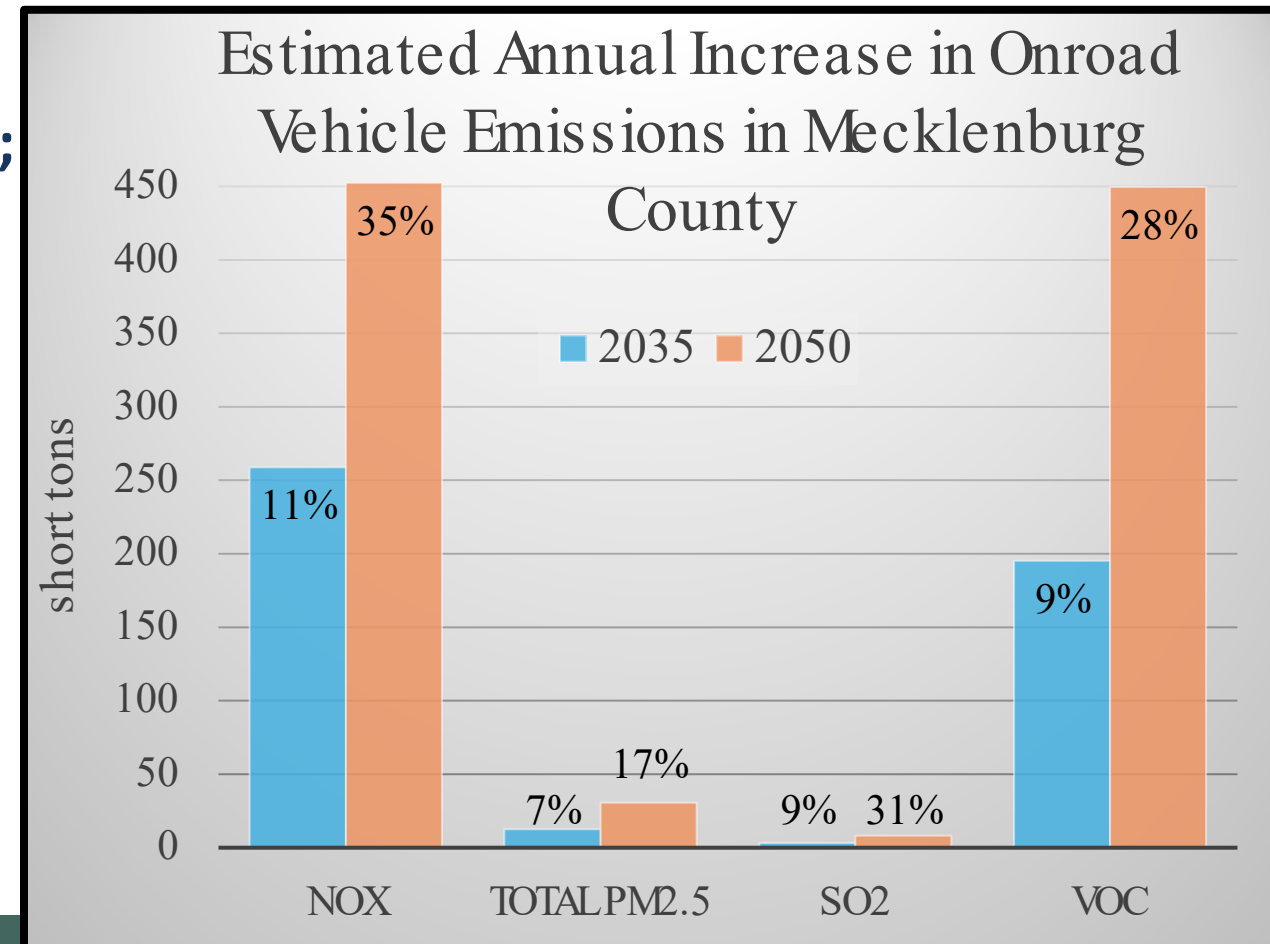
# Summary of NC DAQ's Comments on EPA's Proposed Rulemaking – Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards

- The NC DAQ analysis shows the EPA's proposed repeal of the GHG vehicle emission standards may increase annual onroad mobile emissions of:

- NO<sub>x</sub> by 11.2% in 2035, and 35.0% in 2050;
- PM<sub>2.5</sub> by 6.6% in 2035 and 17.5% in 2050;
- SO<sub>2</sub> by 8.7% in 2035 and 31.4% in 2050;
- VOC by 8.7% in 2035 and 28.3% in 2050;

...in Mecklenburg County.

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- **NC has become a leader in transportation electrification:**
  - Growing EV manufacturing base;
  - Expanding EV infrastructure; and
  - Supportive clean transportation policies.
- **NC DAQ disagrees that this proposed repeal increases flexibility.**
- **Retroactive removal of compliance obligations creates uncertainty for automakers & investors.**
- **Disrupts long-term planning and undermines innovation in clean vehicle technologies.**
- **Risks job losses and weakens the U.S. position as a global leader in clean transportation.**

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## Final thoughts...

- EPA asserts that the proposed repeal could only have marginal impacts on public health or the environment at local or regional levels.
- EPA provides no supporting evidence to justify its claim of only marginal adverse impacts.
- NC DAQ's modeling analysis shows increases in NO<sub>x</sub>, VOC, PM<sub>2.5</sub> and SO<sub>2</sub>.
  - Especially concerning for areas with narrow margins for meeting the NAAQS.
    - Hinders the state's ability to maintain on-going compliance, mitigate climate impacts, and support economic stability and growth.
- NC DAQ requested EPA withdraw the proposed repeal and urged collaboration with states and stakeholders to implement effective strategies that protect public health and economic growth.



# Division of Air Quality - Contacts

**Mike Abraczinskas, EIT, CPM**  
**Director**

**NC Division of Air Quality**  
**919-707-8447**

[Michael.Abraczinskas@deq.nc.gov](mailto:Michael.Abraczinskas@deq.nc.gov)

**Taylor Hartsfield, EIT, CPM**  
**Deputy Director**

**NC Division of Air Quality**  
**919-707-8497**

[Taylor.Hartsfield@deq.nc.gov](mailto:Taylor.Hartsfield@deq.nc.gov)

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