

**Testimony of Northeast States for Coordinated Air Use Management
On Notice of Proposed Rulemaking: Repeal of Emission Requirements for Gliders
[EPA-HQ-OAR-2014-0827]
December 4, 2017
Washington, D.C.**

Good morning, my name is Matt Solomon. I am Transportation Program Manager for the Northeast States for Coordinated Air Use Management. NESCAUM is the association of air pollution control agencies in Connecticut, Maine, Massachusetts, New Hampshire, New Jersey, New York, Rhode Island, and Vermont. I am speaking today in strong opposition to the proposed rulemaking because of the very serious harm to air quality and public health that will occur in our region if the glider kit loophole is re-opened.

The proposed repeal of emission requirements for gliders would substantially worsen air quality in our states. Based on EPA's own estimates, we estimate that the excess NOx emissions from these uncontrolled trucks could be more than ten times those from all noncompliant Volkswagen cars, and by 2040 could rival the *entire* 2018 NOx budget for fossil fuel power plants in the 22 states covered by the Cross-State Air Pollution Rule Update.

It is not difficult to see why these impacts are so large. The effectiveness of advanced emission controls for both nitrogen oxides (NOx) and particulate matter (PM) has been exhaustively demonstrated. Recent additional testing by both EPA and CARB confirms what we already know – that trucks equipped with diesel particulate filters (DPFs) and selective catalytic reduction (SCR) systems emit far less pollution than trucks without this equipment. Notably, there is no evidence in the Tennessee Tech study that actually contradicts this basic fact.

We also believe that EPA does indeed have the authority to not repeal this rule.

Highway trucks are the largest sector source of NOx emissions in the northeast region. Our states have long supported and relied upon strong – and smart – federal regulation to ensure that emissions from this sector are gradually reduced over time. The highway diesel engine rule is vital to our states' efforts to attain or maintain air quality standards. It was developed with comprehensive stakeholder input, and informed by rigorous technical analysis. One result has been that we are on a path to much cleaner air than we would have been if the highway diesel rule had not been promulgated. Another result is that U.S. companies are thriving as they've become leaders in many of the advanced emission reducing technologies that will continue to be in demand around the world for years to come. The proposed rulemaking would undercut these companies' strength here in the U.S., and could trigger a 'race to the bottom' if more truck manufacturers are drawn into glider production, leading to still more harmful impacts to air quality and public health.

There is no way to understand the dramatic increase in sales of glider kits, all with old, dirty engines, except as a concerted effort to circumvent critical public health protections. This is unfair to citizens in our states and across the country who will continue to be exposed to elevated emissions of harmful pollutants; and it is unfair to the many businesses in our states and across the country that are playing by the rules. This loophole must remain closed.

NESCAUM and our member states are committed to clean vehicles and to clean air. We intend to submit more detailed written comments by the January 5, 2018 deadline. We appreciate the opportunity to share our initial thoughts here today.

Thank you.