

December 14, 2017

William Wehrum, Assistant Administrator
US EPA, Office of Air and Radiation (6103A)
Mail Code 6103A
1200 Pennsylvania Ave., NW
Washington, DC 20460
Attention: Docket ID No. EPA-HQ-OAR-2014-0827

Re: *30-day comment deadline extension request – Proposed Repeal of Emission Requirements for Glider Vehicles, Glider Engines, and Glider Kits*

Dear Mr. Wehrum:

The Northeast States for Coordinated Air Use Management (NESCAUM) respectfully request a 30-day extension of the deadline to comment on the US EPA proposed rule “Repeal of Emission Requirements for Glider Vehicles, Glider Engines, and Glider Kits” (Docket ID No. EPA-HQ-OAR-2014-0827). The current comment deadline is January 5, 2018 (82 Fed. Reg. 53442).

NESCAUM requests the 30-day extension based on the practical difficulties of commenting on this important rulemaking during a series of major U.S. holidays, as well as a currently incomplete docket record, as noted by the US EPA in supporting documents posted to the rulemaking docket after publication of the Federal Register notice. Our requested extension is critical to ensure that state regulatory agencies and other stakeholders have adequate time to fully analyze and comment on the proposal.

The proposed repeal of glider requirements appeared in the Federal Register on November 16, 2017 with a comment deadline of January 5, 2018. During the comment period are major holidays extending from Thanksgiving through New Year’s Day. As a practical matter, these holidays significantly compress the available time to comment on a major rule that has important implications for public health and the ability of our states to effectively implement air quality programs.

In addition, the US EPA added to the docket on November 22 (after publication of the proposal) two significant items requiring careful review. These items are the US EPA Memorandum “EPA Teleconference with Tennessee Tech University Regarding Glider Test Report Summarized in June 2017 Letter” (EPA-HQ-OAR-2014-0827-2416) and the US EPA “Chassis Dynamometer Testing of Two Recent Model Year Heavy-Duty On-Highway Diesel Glider Vehicles” (EPA-HQ-OAR-2014-0827-2417). The US EPA has cited the Tennessee Tech Test Report in its proposed repeal of the glider requirements, yet the summary of its teleconference with the Tennessee Tech researchers indicates the agency has requested additional information on this study (e.g., information on each tested vehicle’s engine, mileage, and age, and measured nitrogen

oxides (NOx) emissions). The US EPA's requested information does not currently appear in the docket for commentators' review, and will be difficult to fully consider when it appears at this late stage of the comment period. Furthermore, the US EPA's own testing results of two glider kits appeared in the docket after publication of the Federal Register notice, and we need additional time to review its findings as well. The US EPA's test results indicate significant burdens will be placed upon our state air quality programs by allowing for a large increase of NOx and fine particulate emissions from on-road heavy-duty trucks that had not previously been expected or accounted for by state air quality planners. The obvious implications of the US EPA study for public health protection deserve a fuller consideration than currently provided by the January 5, 2018 comment deadline.

We look forward to working with you on our shared goals to improve the nation's air quality and protect public health, and thank you for your consideration of our request.

Sincerely,



Paul J. Miller
Deputy Director

cc: NESCAUM state directors
Chris Grundler, EPA OTAQ
David Conroy, EPA R1
Richard Ruvo, EPA R2