

January 29, 2020

Andrew Wheeler, Administrator
U.S. Environmental Protection Agency
Air and Radiation Docket and Information Center
EPA Docket Center, EPA WJC West Building
1301 Constitution Avenue, N.W. Room 3334
Washington, D.C. 20004

Attention: Docket ID No. EPA-HQ-OAR-2019-0055

Re: *30-day comment deadline extension request – Control of Air Pollution from New Motor Vehicles: Heavy-Duty Engine Standards*

Dear Mr. Wheeler:

The Northeast States for Coordinated Air Use Management (NESCAUM) respectfully request a 30-day extension of the deadline to comment on the US EPA advance notice of proposed rulemaking “Control of Air Pollution from New Motor Vehicles: Heavy-Duty Engine Standards” (Docket ID No. EPA-HQ-OAR-2019-0055). The current comment deadline is February 20, 2020 (85 Fed. Reg. 3306).

NESCAUM requests the 30-day extension – which would bring the total comment period to 60 days - based on the difficulties of commenting on this important notice in the compressed timeframe set out by EPA in the advance 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 notice.

The advance notice for control of air pollution from new heavy-duty engines appeared in the Federal Register on January 21, 2020 with a comment deadline of February 20, 2020. The notice asks for comments on over 50 technical and programmatic elements. The stringency and the structure of a future heavy-duty engine regulation are of utmost importance to the Northeast states since heavy-duty vehicles contribute significantly to poor air quality and adverse public health impacts in our region. In order to comment on a major advance notice that has important implications for public health and the ability of our states to effectively implement air quality programs, states in the region require the requested extension to complete comments.

In addition, the US EPA added to the docket 190 supporting documents that require careful review. These documents contain detailed information on the technical feasibility of controlling heavy-duty engine and vehicle emissions, policy documents evaluating testing and certification

protocols, results from research studies, and other information. Review of these documents will require more time than the allotted 30 days.

Given this advance notice could lead to a regulation controlling emissions from heavy-duty engines and the importance of this sector to environmental and public health in the Northeast states, NESCAUM also requests that EPA hold a technical workshop to review the new engine emissions standards EPA is considering and potential approaches for controlling heavy-duty vehicle in-use emissions.

The implications of the US EPA advance notice for public health protection deserve a fuller consideration than currently provided by the February 20, 2020 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,

A handwritten signature in blue ink, appearing to read "Paul J. Miller".

Paul J. Miller
Executive Director

cc: NESCAUM state directors
Anne Idsal, EPA OAR
Sarah Dunham, EPA OTAQ
Bill Charmley, EPA OTAQ
Lynne Hamjian, EPA R1
Richard Ruvo, EPA R2