

Harold P. Wimmer  
National President and  
CEO

December 20, 2017

The Honorable William Wehrum  
Assistant Administrator for Air and Radiation  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave., NW  
Washington, DC 20460

Re: *Proposed Repeal of Emission Requirements for Glider Vehicles, Glider Engines, and Glider Kits – 60-day comment deadline extension request*  
Docket ID No. EPA-HQ-OAR-2014-0827

Dear Mr. Wehrum:

The American Lung Association respectfully requests a 60-day extension of the January 5, 2018, comment deadline on the proposed rule “Repeal of Emission Requirements for Glider Vehicles, Glider Engines, and Glider Kits” (Docket ID No. EPA-HQ-OAR-2014-0827) to March 5, 2018.

The Lung Association requests this extension because, under the current comment timeline, we will have difficulty completing detailed comments that fully analyze the proposal and its far-reaching and long-lasting adverse impacts on the nation’s air quality. With three major federal holidays falling during the comment period and the recent posting of significant documents to the docket after the initial proposal publication, quite simply, we need more time.

We note that EPA has not conducted any air quality modeling nor completed a regulatory impact analysis fully quantifying the health impacts of the proposal. EPA has failed to do this analysis despite the significant increases in emissions associated with the proposal and their unacceptable impact on public health. Just to cite three of the well-documented harms from these emissions: particulate matter causes thousands of premature deaths; the World Health Organization has classified diesel exhaust as a group 1 carcinogen; and nitrogen oxides are a primary precursor of ozone.

**Advocacy Office:**

1331 Pennsylvania Avenue NW, Suite 1425 North  
Washington, DC 20004-1710  
Ph: 202-785-3355 F: 202-452-1805

**Corporate Office:**

55 West Wacker Drive, Suite 1150 | Chicago, IL 60601  
Ph: 312-801-7630 F: 202-452-1805 info@Lung.org

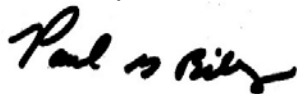
Providing further evidence of the health risks, EPA added an important analysis of glider truck emissions to the docket on November 22, 2017 that requires more time for review than is currently available. The analysis, "Chassis Dynamometer Testing of Two Recent Model Year Heavy-Duty On-Highway Diesel Glider Vehicles," indicates that glider trucks under transient testing conditions may emit up to 450 times more particulate matter as comparable 2014 and 2015 model year trucks.

Further, on November 22, 2017, EPA added a memorandum to the docket: "EPA Teleconference with Tennessee Tech University Regarding Glider Test Report Summarized in June 2017 Letter." The proposed repeal cites the analysis from Tennessee Technological University as justification for the proposal; however, the EPA memorandum raises many questions about the University's analysis, the test procedures followed and the results presented. The memorandum indicates that EPA will request additional information about "each of the test articles regarding engine and vehicle mileage and age" and "NOx emission levels associated with each test article." However, as of December 19, 2017, no additional information has been posted to the docket.

In light of the significant public health ramifications of the proposal, the new information added to the docket and the challenge of the brief comment period with the proposal publication in the November 16, 2017 Federal Register, we respectfully request that the comment period be extended until March 5, 2018 to permit all stakeholders to provide comments on this proposal.

Thank you for your consideration of this request.

Sincerely,



Paul G. Billings  
Senior Vice President, Advocacy

