

February 3, 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:

On behalf of the members of the Manufacturers of Emission Control Association (MECA) and the Advanced Engine Systems Institute (AESI), we are writing to 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 ANPR appeared in the Federal Register on January 21, 2020 with a comment deadline of February 20, 2020. The notice asks for comments on dozens of highly technical issues. In order to comment thoroughly and effectively on a major advance notice that has important implications for public health and emission control technology that will deliver ultra-low NOx performance, suppliers and other stakeholders would benefit greatly from a 30-day extension to complete comments.

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, new potential testing and certification protocols, and critical new studies. Careful review of these documents will require more time than the allotted 30 days.

We believe that additional NOx emission reductions from new heavy-duty engines beyond the current EPA 2010 requirements are achievable and cost-effective by combining the improvements made to engines, emission control technologies, and fuels over the past twenty years. The emission control technologies that will deliver lower NOx emissions in the future will not look much different than they do today, incorporating advancements in substrates, catalysts, exhaust gas recirculation, turbochargers, fuel injectors, and calibrations. MECA, AESI and our members need this requested extension in order to provide the Agency with an appropriate and complete set of comments on these technologies and potentially significant programmatic changes.

Thank you for considering this comment deadline extension request, and we look forward to working with EPA, the states, and others toward a successful implementation of the Cleaner Truck Initiative (CTI).

Sincerely,

Handwritten signature of Rasto Brezny in black ink.

Rasto Brezny
Executive Director
Manufacturers of Emission Controls Association

Handwritten signature of Christopher Miller in blue ink.

Christopher Miller
Executive Director
Advanced Engine Systems Institute