AMERICAN LUNG ASSOCIATION®

Harold P. Wimmer
National President and
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July 30, 2018

The Honorable Andrew Wheeler
Acting Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

Please Withdraw the Proposed Repeal of Emission Requirements for Glider Vehicles, Glider Engines, and Glider Kits

Dear Acting Administrator Wheeler:

The American Lung Association is pleased to learn that the U.S. Environmental Protection Agency will withdraw the "Conditional No Action Assurance Regarding Small Manufacturers of Glider Vehicles." Reversing the effort to waive enforcement of the glider truck rules is the correct decision.

Glider trucks are a significant source of air pollution that threatens public health and the environment. To protect public health, we now call on you to immediately withdraw the Proposed Repeal of Emission Requirements for Glider Vehicles, Glider Engines, and Glider Kits.

The American Lung Association calls on you to take this action to protect the lives and health of the people we serve. We work on behalf of the 33 million Americans living with lung diseases, including asthma, lung cancer and COPD, and we fight to protect all Americans from breathing unhealthy air.

During the limited public comment period on the proposed repeal, the Lung Association submitted comments showing that glider trucks are new trucks, and that Congress intended the Clean Air Act to ensure that emissions controls are deployed on new vehicles as quickly as possible.

These controls are particularly urgent given the fact that glider trucks create much more pollution than other trucks. In a November 20, 2017

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report, EPA showed that under highway cruise conditions, particulate matter (PM) emissions were 55 times higher than comparable model year 2014 and 2015 vehicles.

The 2017 EPA testing also showed that nitrogen oxides (NOx) emissions from the glider test vehicles were 43 times higher than the comparable truck under highway cruise conditions and 4-5 times higher under transient operations. Under transient testing conditions, PM emissions from a dirty diesel truck were 450 times higher than a comparable truck.

If EPA finalizes its proposal to repeal the requirements, the potential sale of tens of thousands of new glider trucks with emissions at these levels would pose an immediate threat to public health and the environment. In its 2016 rulemaking, EPA estimated that closing the loophole would avoid up to 1,600 premature deaths over the lifetime of the trucks sold in 2017 alone.

The proposal was based on flawed legal theory and does not include any technical analysis to support it. EPA relied on a study conducted by Tennessee Technological University that is under investigation for research misconduct, and the president of the university has requested that EPA not use the study. EPA also did not conduct a Regulatory Impact Assessment for this proposal. The EPA Science Advisory Board has asked to conduct a review regarding the adequacy of the supporting science. In sum, the proposal is flawed.

PM and NOx can impact anyone's health, but children, the elderly, and people with chronic diseases are particularly vulnerable. In addition to premature death, PM triggers asthma attacks, heart attacks and strokes and causes lung cancer. NOx is dangerous on its own and can also react to form ozone pollution, which also causes asthma attacks and other lung and heart problems.

On behalf of the millions of Americans with lung disease we serve, and all whose health is at risk from increased emissions from future glider trucks, I urge you to withdraw EPA's Proposal to Repeal Emission Requirements for Glider Vehicles, Glider Engines, and Glider Kits. Doing so is essential to fulfilling EPA's mission and the promise of the Clean Air Act of healthy air for all to breathe.

Sincerely,

Harold P. Wimmer
National President and CEO