

December 2, 1999

Air and Radiation Docket
Attention: Docket No. A-98-32
U.S. Environmental Protection Agency
Room M-1500 (MC 6102)
401 M Street, SW
Washington, DC 20460

To Whom It May Concern:

On behalf of the State and Territorial Air Pollution Program Administrators (STAPPA) and the Association of Local Air Pollution Control Officials (ALAPCO), we are pleased to provide the attached comments on the U.S. Environmental Protection Agency's (EPA's) October 29, 1999 notice of proposed rulemaking (NPRM) on the control of emissions from 2004 and later model year heavy-duty highway engines and vehicles and the revision of the light-duty truck definition (64 *Federal Register* 58472).

As we note in our comments, the regulation of heavy-duty engines and fuels is a critical issue for state and local air officials and we are pleased that, in the NPRM, EPA not only looks beyond near-term needs, but also takes a comprehensive systems approach to controlling the onroad segment of this very significant source of air pollution.

For the past several years, STAPPA and ALAPCO have played an active role in the development of a systems approach for addressing emissions from cars and light trucks. The associations have been, and remain, vigorous advocates of strong programs for both federal Tier 2 motor vehicle standards and a national low-sulfur gasoline program because of a critical air quality need and the tremendous environmental benefits offered by these programs. We are equally committed to addressing heavy-duty engine emissions and diesel fuel quality with the same vigor.

STAPPA and ALAPCO are, therefore, pleased to have this opportunity to provide our perspectives on this important proposal and offer the following

comments and recommendations, both on background issues related to heavy-duty engines, vehicles and fuels and on specific aspects of the NPRM.

If we can provide any further information, please do not hesitate to contact either of us. On behalf of STAPPA and ALAPCO, we offer our assistance as you continue to address this important issue.

Sincerely,

John Elston
STAPPA Chair
Mobile Sources and Fuels Committee
Committee

Richard H. Baldwin
ALAPCO Chair
Mobile Sources and Fuels

Attachment