

March 26, 1997

Margo Oge
Director
Office of Mobile Sources
Office of Air and Radiation
U.S. Environmental Protection Agency
401 M Street, SW
Washington, DC 20460

Dear Margo:

The State and Territorial Air Pollution Program Administrators (STAPPA) and the Association of Local Air Pollution Control Officials (ALAPCO) would like to take this opportunity to provide support for the U.S. Environmental Protection Agency's (EPA's) efforts to pursue an emissions control program for nonroad diesel engines, as outlined in the agency's Supplemental Advance Notice of Proposed Rulemaking, published on January 2, 1997 (62 Federal Register 199).

On several occasions over the past few years, STAPPA and ALAPCO have formally expressed such support to EPA and have consistently encouraged the agency to develop and promulgate new national controls for both onroad and nonroad heavy-duty diesels. Earlier this month, in our comments to EPA on the agency's proposed Interim Implementation Policy for new and revised ozone and particulate matter (PM) National Ambient Air Quality Standards (NAAQS), the associations noted that "in addition to those control efforts being undertaken by states, localities and regional groups, it is absolutely critical that EPA do its fair share to reduce emissions that contribute to ozone and PM levels by promulgating the most effective national control programs possible for key source categories that are best regulated on the national level." Particularly in that federal law prohibits states and localities from initiating control programs for many classes of heavy-duty engines, a new national program to reduce emissions from nonroad diesel engines is especially important. Further, the need for such a program to be the most effective possible can not be overstated.

Under the existing ozone and PM NAAQS, the regulation of nonroad diesel engines will play an important role in the attainment and maintenance efforts of many areas. Moreover, should EPA promulgate revised ozone and PM10 standards and a new standard for PM2.5, as proposed, such a control strategy will be even more critical.

On behalf of STAPPA and ALAPCO, we look forward to working with you and your staff as you develop a proposal for regulating nonroad diesel engines. If we can provide

you with further information, please feel free to contact either of us or S. William Becker,
Executive Director of STAPPA and ALAPCO.

Sincerely,

Joseph R. Williams
STAPPA President

Bruce S. Andersen
ALAPCO President