



# Western Regional Air Partnership

January 28, 2003

The Honorable Christine Todd Whitman  
Administrator  
U.S. Environmental Protection Agency (1101A)  
Ariel Rios Building  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

Dear Administrator Whitman:

On behalf of the Western Regional Air Partnership (WRAP), we are writing to encourage EPA's adoption of rigorous new engine and fuel sulfur standards for non-road diesel sources, such as those used in construction, mining, industrial, and farming equipment, as well as new fuel sulfur standards for locomotives and commercial marine vessels.

Last summer, EPA expressed its intent to propose these new standards, working cooperatively with the Office of Management and Budget (OMB). We urge EPA and OMB to expedite this proposal and suggest that the new non-road diesel engine and fuel sulfur standards be similar in stringency to those already in place for on-road diesel sources. This action is necessary if the West is to make reasonable progress toward improving visibility in our nation's Class I areas as required by the Clean Air Act and EPA's regional haze regulations. This action is also important for states striving to meet health-based air quality standards and will reduce significant health risks associated with toxic air pollutants emitted by non-road diesel engines in all states.

As you know, the WRAP is a collaborative effort of western tribes, western states, and federal agencies working with business and environmental interests to implement the recommendations of the Grand Canyon Visibility Transport Commission and develop the technical and policy tools needed by Western states and tribes to comply with EPA's regional haze regulations. The WRAP estimates that in the absence of new engine and fuel sulfur standards for non-road diesel sources, future emissions from non-road sources in the West will be significantly higher than those from on-road sources.

In addition to adopting these new standards, we strongly encourage EPA, working cooperatively with states and tribes, to continue and expand its efforts to reduce emissions from existing on-road and non-road diesel engines. Existing diesel engines will operate for many years before being replaced by engines meeting the new standards. We believe that states and tribes, working collaboratively with EPA, can design cost-effective retrofit programs resulting in substantial

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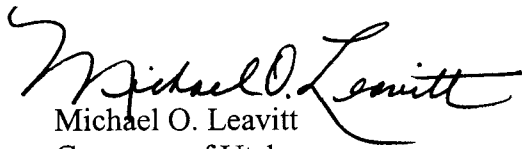
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emission reductions from these sources. EPA staff have met with WRAP members over the last year and discussed a number of opportunities to collaborate on diesel retrofit programs, and we are very interested in pursuing these opportunities with EPA. Along these same lines, the WRAP suggests that EPA evaluate how it might use the forthcoming rules to achieve clean retrofits of large non-road engines when they are rebuilt.

Thank you for all of your efforts to improve our nation's air quality. The WRAP looks forward to commenting on EPA's proposed standards for non-road diesel sources and we pledge to work with you to ensure that the final rule effectively addresses this source category.

Sincerely,

  
Michael O. Leavitt  
Governor of Utah  
WRAP Co-Chair

  
Fred S. Vallo, Sr.  
Governor of Pueblo of Acoma  
WRAP Co-Chair

cc: John D. Graham, OMB  
Jeff Holmstead, EPA  
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