MEMORANDUM

To: William Charmley
From: Charles Moulis
Date: November 15, 2017
Re: Summary of Glider Production Data

As you know, we recently received glider kit production data from Daimler Trucks North America (DTNA) and PACCAR – the primary suppliers of glider kits. This memorandum summarizes the data which are attached. Please note that both DTNA and PACCAR identified the data as confidential business information (CBI) under 40 CFR part 2.

As you can see from Figure 1, prior to 2010, estimated glider kit production volumes are less than 1,000 vehicles per year.\[CBI-Redacted\]

![Figure 1 - Summary of Data](image)

The data also show that glider production increased steadily from 2010 until reaching a peak of significantly over 10,000 gliders in 2015 – an order of magnitude change from 2010. Glider production dropped in 2016, coinciding with overall drop in the production and sale of all Class 8 trucks that year.
Because the 2017 production year is not yet complete, we projected the annual volume to be equal to the 2014 volume, which is the maximum amount allowed by the regulations. Actual production volume may be slightly less than this. However, the incomplete data provided indicate any such difference will be small.

Both DTNA and PACCAR provided additional information along with their overall glider kit production volumes. Some of this information is shown in Tables 1 through 3. EPA also received production information from small glider assemblers in their requests for exemption under 40 CFR 1037.150. Table 4 shows the production and sales data provided to EPA for the largest independent glider assembler. Taken together, these data support the following observations:

- The vast majority of glider vehicles being produced currently are tractors.
- Prior to 2010, no independent glider assembler produced 300 or more glider vehicles per year.
- Nearly all engines for recent glider production are 1998-2002 pre-EGR engines. There are a small but significant number of 2004-2006 engines used, but very few 2007 and later engines.
- A majority of glider vehicles are being produced by a small number of companies.
- In 2016, there were hundreds more assemblers that produced 10 or fewer gliders per year. It appears that most of these assemblers qualify as small businesses. However, it is not clear what fraction of these assemblers produce gliders for resale rather than their own use.

Thus, we cannot precisely quantify how many post-2002 engines are used in gliders or how many companies will be impacted by the 300 cap. However, both DTNA and PACCAR have seen the observations noted above, and neither objected to them as being inconsistent with their understanding of the market.