

PAKIS, GIOTES, PAGE & BURLESON

A PROFESSIONAL CORPORATION

ATTORNEYS AND COUNSELORS AT LAW

DAVID C. ALFORD
LEE ALLGOOD
JOSH BORDERUD
JOHN BURLESON
RODNEY A. CHAMNESS
MICHAEL G. COSBY
DAVID N. DEACONSON
CARLIE C. GAUSE
ARTIE G. GIOTES
JIM HERING
FRED M. JOHNSON, JR.
C. SCOTT OMO
JACK RANDALL PAGE
GENEVA BROWN TURNER

April 9, 2015

MAIL TO:
POST OFFICE BOX 58
WACO, TEXAS
76703-0058

PHONE (254)297-7300
FAX (254)297-7301
www.pakislaw.com

WILLIAM R. PAKIS
OF COUNSEL

Via FedEx

National Freedom of Information Officer
US Environmental Protection Agency
1200 Pennsylvania Avenue, N.W. (2822T)
Washington, DC 20460

Re: EPA Response to Technical/Engineering Hardship Requests From Federal Signal and Alamo Group Posted on June 9, 2014 Pursuant to 40 CFR 1039.625(m)

Dear Sir or Madam:

This firm represents Tymco, Inc., in Waco, Texas.

Tymco manufactures street sweepers, and is impacted by EPA standards found in 40 CFR § 1039.625 governing emission standards for nonroad engines. Tymco purchases those engines from manufacturers and installs them on street sweepers that it manufactures and sells. Tymco has been working hard to comply with the EPA regulations in question in a timely fashion.

It has been brought to our attention that two companies, Federal Signal and Alamo Group, both of which also manufacture street sweepers, applied for Technical/Engineering hardships to delay the impact of the regulations on their companies, while Tymco has applied for no such hardship exception – despite the fact that Tymco is much smaller than either of those two entities. According to the EPA website, Federal Signal and Alamo Group requests for technical/engineering hardships were posted June 9 of 2014.

Therefore, we are specifically requesting, under the Freedom of Information Act, a copy of any documents reflecting the status of the requests of Federal Signal and Alamo Group for Technical/Engineering hardships they submitted pursuant to 40 CFR 1039.625(m). This request specifically includes any communication from the EPA which grants or denies such hardship requests, or reflecting whether the hardship requests were withdrawn. If any hardship requests were granted, we are also seeking documents from the EPA reflecting the terms governing the grant of any such request.

EXHIBIT "A"

National Freedom of Information Officer

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If any of the foregoing is unclear, please respond directly to me and I will be happy to clarify this request.

Very truly yours

PAKIS, GIOTES, PAGE & BURLESON, P.C.

Michael G. Cosby

MGC/jy

cc: Steven DeBord
Via email to debord.steven@epa.gov

cc: Kenneth Young