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Item #1

Environmental Activities Staff  
General Motors Corporation  
General Motors Technical Center  
Warren, Michigan 48090

Betsy ANCKER-JOHNSON  
Vice President

September 30, 1983

The Honorable William D. Ruckelshaus  
Administrator  
U.S. Environmental Protection Agency  
401 M Street, S.W.  
Washington, D.C. 20460

Dear Mr. Ruckelshaus:

Subject: Petition for reconsideration - Title 40  
Code of Federal Regulations, Chapter I,  
Part 205 Transport Equipment, Noise  
Emission Controls, Medium and Heavy Trucks

General Motors Corporation hereby petitions the United States Environmental Protection Agency (EPA) to delay the effective date of the 80 dB noise standard for medium and heavy trucks (40CFR, Part 205) so that it is coincident with the effective date (post-1986) of new heavy duty engine exhaust emissions standards.

Early in 1981, because of the downturn in the economic condition of the truck manufacturing industry and an unforeseen increase in the demand for medium diesel trucks which are the most costly to quiet, the EPA Office of Noise Abatement and Control granted a one year deferral, to January 1, 1983, of the effective date of the medium and heavy truck 80 dB passby noise standard. The Agency stated that the purpose of this action was to provide temporary relief from expenditures that would have been needed to bring these trucks into compliance with the 80 dB standard as of January 1, 1982.

With the recession deepening, an additional three year delay of the 80 dB noise standard was granted by EPA, with the following explanation:

"In consideration of the present economic state of the truck industry and the potential interrelationship of design changes that may be required to meet the 80 dB standard with technological innovations now being considered to

reduce exhaust emissions and improve fuel economy, the Administrator has concluded that an additional three-year deferral of the 80 dB standard for medium and heavy trucks to 1986 is appropriate. Thus, the purpose of this deferral is twofold: First to provide near-term economic relief to the truck industry by allowing them to temporarily divert those resources that would otherwise be used to comply with the 1983 80 dB standard to help meet their near-term economic recovery needs, and second, to permit manufacturers to align and economize the design requirements attendant to the 80 dB standard with improved fuel economy designs and Federal air emissions standards anticipated in the 1986 timeframe." (47 FR 7186, February 17, 1982.)

Despite encouraging reports of the effects of economic recovery on sales of passenger cars and light trucks, the medium and heavy truck segment of the automotive industry continues to suffer from sales conditions which prevailed during the recession. For this reason, General Motors contends that the circumstances that existed in 1981, when EPA granted the two postponements, are just as prevalent today as they were at that time.

Domestic truck sales for 1982 were only 47 percent of sales in the 1979 peak sales year. For the 1983 model year, through August 1983, sales of GM trucks over 10,000 pounds are at 39 percent of sales in the 1979 peak sales year for the same period. Thus, the economic status of the medium and heavy truck industry is still seriously depressed.

Even though present economic indicators suggest that the effects of the recession have turned the corner for the passenger car and light truck segment of the industry and that the nation is on its way to recovery, it should be noted that the truck manufacturing industry historically trails other segments of the economy in recovery by at least six months to a year. Present industry projections suggest only a modest improvement in sales in 1984 with a possible return to pre-recession production by 1985 or 1986. Thus, significant improvement in the truck manufacturing industry's cash flow is not expected to occur for some time to come.

Development and release of vehicle designs that comply with the 80 dB standard require a significant expenditure of resources. General Motors Truck and Bus Group alone committed over two calendar years of effort and expended \$4.5 million for the original 1982 releases to comply with the 80 dB standard (prior to its postponement). Most of this expenditure will not be recoverable because market forces have dictated changes in product offerings since then.

We are submitting this petition at this time because the two-and-one-half to three year lead time, required for the orderly implementation of vehicle noise control designs to meet a 1986 production schedule, necessitates the immediate commitment of still scarce resources, money and personnel, to design and development testing. Thus, we have established programs and are presently beginning to expend funds to develop noise control measures to enable new GM trucks to meet the 80 dB standard in 1986.

In the interest of averting repeat noise development programs (a program for current engine designs and a second program two years hence for engines designed to meet new diesel particulate and more stringent NOx standards), and to permit the industry to coordinate design programs for noise and emission control requirements, General Motors recommends establishing the effective date for the 80 dB noise standard to coincide with the implementation date for these future heavy duty engine exhaust emission controls.

It is our understanding that the EPA is currently preparing proposed rules for the new heavy duty engine emission standards to become effective some time after 1986. It is particularly important that the effective date for the 80 dB noise standard be likewise delayed to be coincident with the emissions requirements because the noise characteristics of new vehicles will be dependent on the hardware necessary to meet exhaust emissions standards.

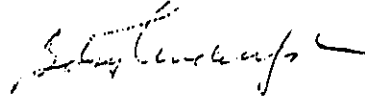
In evaluating this petition, the EPA is asked to consider the fact that truck-related environmental noise has been significantly reduced since 1978 when the 83 dB standard became effective. Furthermore, truck-generated environmental noise continues to decrease in severity as older, noisier trucks are replaced by newer models designed to meet an 83 dB standard and as noisier bias-ply tires are replaced by quieter radial tires. Thus, it is General Motors belief that a two or three year delay in the effective date of the 80 dB standard would have an insignificant adverse impact, if any, on environmental noise levels.

In summary, General Motors requests that the EPA defer the effective date of the 80 dB truck noise standard to coincide with the effective date of the new heavy duty engine NOx and diesel particulate exhaust emissions standards. This action will result in badly needed economic relief for the truck manufacturing and trucking industries, primarily due to a singular noise reduction design effort coordinated with emission-related design programs, with minimal environmental noise impact.

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If we can be of assistance to you or your staff in answering any questions regarding this petition, please do not hesitate to call Mr. P. P. Pataky on (313) 575-1626, or Mr. E. R. Pezon on (313) 575-2008.

Very truly yours,



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