

AMERICAN
TRUCKING
ASSOCIATIONS, INC.

1616 P Street, N.W., Washington, D.C. 20036

7-96-01
II-A-960

Docket # OPMD-0184
Item # 4

TECHNICAL SERVICES DIVISION
William E. Johns
Managing Director

ENGINEERING DEPARTMENT
(202) 797-5391

January 9, 1984

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

Dear Mr. Ruckelshaus:

Subject: Petition for reconsideration - Title 40 Code of Federal Regulations, Chapter 1, Part 205 Transport Equipment, Noise Emission Controls, Medium and Heavy Trucks.

The American Trucking Associations, Inc. (ATA) herein petitions the U.S. Environmental Protection Agency to stay temporarily the implementation of the 80 decibel noise emission standard for new medium and heavy trucks, 40 C.F.R. Part 205, beyond the January 1, 1986 effective date in order that compliance with it will coincide with the effective date of the recently-combined heavy-duty engine exhaust emission standards for nitrogen oxides (NO_x) and diesel particulates. At this time, the effective date of these latter standards has not yet been announced but we understand that they will be prescribed for 1987 or later model year engines.

A temporary stay of the nature requested is not unprecedented. In a Federal Register notice, February 17, 1982, 47 Fed. Reg. 7186, the EPA rescheduled the effective date of the 80 decibel (dB) medium and heavy truck noise emission standard from January 1, 1983 to January 1, 1986. In doing so, the Agency stated:

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 emission standards anticipated in the 1986 time-frame.

Essentially, nothing has changed since EPA expressed the foregoing. The financial condition of the motor carrier industry remains relatively poor. This has directly impacted upon the financial conditions of truck manufacturers, moreover, due to an existing surplus of unused equipment and a well-stocked used truck market, any recovery for truck manufacturers will lag significantly behind that of the motor carriers.

Clearly a further postponement is warranted. The NO_x and diesel particulate standards are inherently related and the administrative process of joining the rulemakings has delayed both of the proposals. Arguments in support of permitting manufacturers to economize operations through the alignment of the noise regulation with these two important exhaust emission regulations have not changed. Significant alterations to the engine, and possibly vehicle configuration, will be required to meet the exhaust standards; thus, the possibility of dual compliance costs for both manufacturers and purchasers still exists if the noise and exhaust emission effective dates do not remain allied.

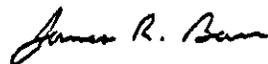
Further, the requested delay will not adversely impact upon ambient noise levels. The motor carrier industry is already in the process of switching from "noisy" bias ply tires to "quiet" radials. As demonstrated by the table in Appendix A, this switch is occurring rapidly.^{1/} This is important because, at highway speeds tire noise is the major contributor to overall vehicle noise levels. Near 100 percent use of radials can certainly be expected to reduce environmental noise levels on or near highways. Additionally, the need for greater fuel efficiency has necessitated the carriers' purchase of low-r.p.m. engines. Low-r.p.m. engines are generally regarded as quieter than engines running at higher revolutions. This trend is expected to continue and, when business improves, will occur at an increasing rate. Certainly these low-r.p.m. engines can be expected to help control ambient noise levels in the slower speed urban areas, where a truck's overall noise level is the direct product of engine and exhaust noise. Finally, the use of 80,000 pound gross vehicle weight trucks and double 27-foot trailers will further contribute to noise reductions. The increased weight limits enacted in the Surface Transportation Assistance Act are expected to reduce truck trips by 9.2 percent and result in operations that are 20 percent more efficient. Because trucks contribute to overall environmental noise, these productivity gains will directly contribute to the reduction in noise levels on and around roadways.

ATA is convinced that the cost savings and operating efficiencies to be gained by manufacturers and purchasers from the coordination of effective dates outweighs a short delay in the admittedly small incremental benefits to be gained by the 80 dB regulations in its early years. Also, the above outlined industry practices will prevent any adverse impact from the additional delay.

^{1/} Appendix A represents the results of an ATA survey on radial tire use. It can be seen that for class 7 and 8 trucks, primarily highway vehicles, radial use is above 90 percent and will approach 100 percent in the near future.

In summary, a further short delay in the effective date of the 80 dB noise standard is essential to the economic stability of the truck industry and to ensure an orderly and efficient alignment of the revised noise and emissions standards with our industry and nation's fuel economy goals. ATA respectfully requests affirmative action on this petition. If I can be of assistance to you or your staff in answering any questions regarding the petition, please do not hesitate to call. Thank you.

Sincerely,



J. R. Barr
Environmental Specialist

JRB:kc

FLEET RADIAL USE

FLEET	TOTAL NUMBER OF TRUCKS		TOTAL NOW ON RADIAL		TOTAL RADIAL POTENTIAL*	
	x Class 7 & 8	y Other	x Class 7 & 8 (%)	y Other (%)	x Class 7 & 8 (%)	y Other (%)
A	13,900	9,900	13,900 (100)	5,940 (60)	13,900 (100)	5,940 (60)
B	7,000	1,000	7,000 (100)	600 (60)	7,000 (100)	600 (60)
C	7,377	1,145	7,377 (100)	1,145 (100)	7,377 (100)	1,145 (100)
D	1,200	--	180 (15)	---	1,200 (100)	---
E	6,396	--	5,437 (85)	---	6,396 (100)	---
F	325	--	163 (50)	---	163 (50)	---
G	850	--	595 (70)	---	850 (100)	---
H	933	46	933 (100)	46 (100)	933 (100)	46 (100)
I	682	36	409 (60)	36 (100)	682 (100)	36 (100)
J	1,797	147	1,797 (100)	147 (100)	1,797 (100)	147 (100)
K	725	--	653 (90)	---	725 (100)	---
L (Y)	5,350	35,354	5,350 (100)	35,354 (100)	5,350 (100)	35,354 (100)
M	4	--	1 (25)	---	4 (100)	---
N	5,266	--	5,266 (100)	---	5,266 (100)	---
O	300	--	10 (3)	---	300 (100)	---
X = 15	52,105		49,071 (94)		51,943 (99+)	
Y = 6		12,274		7,914 (65)		7,914 (65)
Y + Y' = 7		47,628		43,268 (91)		43,268 (91)

* Results from question, "Do you plan to go to 100 percent radials?"



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

Docket No. OPMO - 0184

Item # 12

MEMORANDUM

OFFICE OF
AIR AND RADIATION

SUBJECT: Anticipated Attendance at March 29th Meeting

FROM : Ken Feith *[Signature]*

TO : Distribution

A. The following names of planned attendees have been forwarded to EPA.

International Harvester

Dean Stanley, Vice President, Engineering, Truck Group
Farrel Krall

MVMA

~~Edward Good, Legal Counsel~~ Peter Guskovich
Linas Gobis

Ford

Donald Buist, Director, Automotive Emissions and Fuel Economy Office
David Kulp, Auto Emissions and Fuel Economy
Keith Lewis, Heavy Truck Engineering
Bill King, Washington Office

American Trucking Association

Jim Barr, Environmental Specialist, person yet to be named

General Motors

Gene Pezon, Environmental Activities Staff
Bill Wey, Washington Office
Ron Joyner, Truck and Bus

B. The following EPA staff have been invited to participate:

Sam Gutter, OGC
Louise Giersh, OAR
Rob Weissman, OAR
Bob Rose, OAR
Ken Feith, OAR

C. Meeting will be in room 908 WT on March 29th at 2:00 p.m.

Distribution:

J. Topping
S. Gutter
L. Giersch

R. Weissman
R. Rose