Docket No. OPMO-0184
Item #15

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

II-96-01
II-A-968

APR 12 1984

OFFICE OF
AIR AND RADIATION

Mr. William E. Johns, Managing Director
Technical Services Division
American Trucking Association, Inc.
1616 P. Street, N. W.
Washington, D. C. 20036

Dear Mr. Johns:

We believe that the March 29, 1984 meeting with the American Trucking Association, and the other petitioners requesting EPA's reconsideration of the effective date for the 80 decibel noise emission limit for medium and heavy trucks was of mutual benefit.

As we stated at the beginning of the meeting, the discussions were "on-the-record" and a synopsis will be placed into a public docket.

A principal basis in your petition for deferral is the claim that significant cost savings to manufacturers would result from deferral of the 80 dB effective date until EPA issues new exhaust emission standards for oxides of nitrogen and particulates. Our initial analysis of the petitions indicates that there are critical gaps in the information you have provided to support this and other contentions.

Therefore, it was agreed at the meeting that EPA would provide to the manufacturers and others, a list of questions and requests that it believes essential to consider in reaching a decision. In the interest of time the Agency stated it would not tailor these questions to individual organizations. Consequently, your petition may have already provided one or more answers to the questions listed below. However, I urge you to reexamine your previous submittal and expand as you deem appropriate.

1. Please provide your technical assessment of the interrelationship of oxides of nitrogen and particulate exhaust emission controls to the engineering and design associated with the 80 dB noise emission requirement for your trucks.

2. Please quantify the cost and economic benefits that you would expect to realize by combining the engineering and design of future exhaust emission controls with noise control features requisite to meeting the 80dB noise emission standard. The cost savings determinations should be independent of "effective date" considerations.

3. Please quantify to the extent possible, the potential cost benefits or disbenefits to your company that you would expect to realize from each of the following options concerning the effective date of the 80 dB noise emission standard.

   (a) one year deferral to January 1, 1987.

   (b) two year deferral to January 1, 1988.

   (c) designating the effective date as the first day of the calendar year commensurate with the model year for which EPA's next set of emission standards for oxides of nitrogen and particulates are applicable.

   (d) retain January 1, 1986 effective date.

   Please translate the possible benefits or disbenefits in terms of vehicle cost or savings to purchaser.

4. Please provide your companies' sales forecasts through the model year 1988 and how they compare with your 1980 thru 1983 sales.

5. What percentage of your over 10,000 lb GVWR truck production are vehicles primarly designed for "over-the-road" long haul operation?

6. Please provide your most recent noise emission test data for trucks required to meet the 83 dB standard.

7. Please provide quantitative data concerning your existing surplus of new trucks.

8. Please provide your assessment of the possible impact of used truck sales on your new truck production, that would not otherwise occur in the absence of a deferral.

9. This question is primarily directed at the American Trucking Association. Please provide test data that supports the revised noise level recommendations contained in your letter of November 29, 1982 to the Office of Information and Regulatory Affairs, Office of Management and Budget.

Unless covered by a claim of confidentiality, we will place your comments in the public docket. Please segregate and mark only those portions of your response that you consider proprietary or confidential; stipulating your entire response as proprietary or confidential will greatly restrict its value to the review and decision process.

Clearly, the Agency's mandate is to protect the public's health and welfare. To the extent that the Agency can ensure continued public benefits and also assist the trucking industry in its economic recovery, the Agency will endeavor to do so. We will welcome your suggestions on this latter point.

Please contact me at (202) 382-7753 should you have any questions.

Sincerely,

Kenneth E. Feith
Director of Review

cc: Motor Vehicle Manufacturing Association

Mr. J. R. Barr, American Trucking Association