

DOCKET NO OPMD 0184
ITEM # 24



A-96-01
II-A-976

Donald R. Bulet
Director
Automotive Emissions and
Fuel Economy Office
Environmental and Safety
Engineering Staff

Ford Motor Company
The American Road
Dearborn, Michigan 48121

October 17, 1984

Mr. Kenneth E. Feith
Director of Review
Office of Air and Radiation
U.S. Environmental Protection Agency
Washington, D.C. 20460

Dear Mr. Feith:

This communication supplements our submissions of December 15, 1983, and May 25, 1984, pertaining to deferral of the 80dB(A) heavy truck noise emission standards.

In the above petition, Ford requested that EPA defer the effective date of the 80dB(A) noise emission standard for medium and heavy trucks "so as to make it coincident with the effective date of the more stringent NOx and particulate emission standards that may apply to the 1987 or 1988 models". For planning purposes, Ford assumed, absent a formal rulemaking proposal from EPA regarding truck NOx and particulates, that standards prescribing a maximum of 6 grams/brake horsepower-hour (gm/BHP-hr.) NOx and 0.6 gm/BHP-hr. particulates would be promulgated as early as the 1987 or 1988 model year. In its petition, Ford provided a list of potential major hardware revisions that we and our suppliers believed could be necessary to comply with the assumed emission standards, and pointed out how these revisions could affect engine/vehicle noise control characteristics.

The October 15, 1984, EPA notice of proposed rulemaking (NPRM) (49 FR 40257) contains proposed emissions standards for the 1987 model year which are identical to those assumed by Ford. We are reviewing the technological assumptions utilized in the development of those standards. Within the next week, we expect to provide you with the results of that review, as it relates to possible noise emissions effects.

File: noise

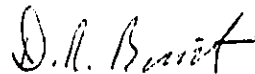
Rec. d. 10/29/84

Efficient and logical product development requires that we have in hand the emissions hardware which complies with the 1987/8 HC/CO/NOx and particulate standards, before developing and testing noise abatement designs for trucks employing that hardware. Furthermore, some engine offerings will be discontinued when the new NOx and particulate standards take effect. Accordingly, it would not make economic sense to require Ford to design trucks for 80dB(A) noise compliance when those designs will be usable for less than one or two years. Because the changes contemplated for emission compliance could affect engine noise and engine packaging, a delay in the implementation of the 80dB(A) standard would be appropriate.

The deferral should end on January 1 of the model year to which the tighter NOx and particulate standards are applicable - the NPRM proposes applicability to the 1987 model year.

To follow up on a point which was discussed in the March 29, 1984 meeting between EPA and representatives of various manufacturers, Ford agrees that a reasonable reduction in the maximum permissible sound levels specified in the interstate motor carrier operations standards for highway operations (40 CFR §202.20), to better align them with the noise emission standard for new trucks, may help improve environmental noise levels. In particular, such a reduction may help eliminate tampering and poor maintenance practices which in the past have caused in-use vehicles to emit excessive sound.

Please contact me should you have any questions on this matter.



D. R. Buist, Director
Automotive Emissions &
Fuel Economy Office