



Docket # OPMO-0184

ITER # 45

n-96-01
II-A-982

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July 11, 1985

Assistant Administrator
Office of Air and Radiation (AR-443)
Docket No. OPMO-0184
U.S. Environmental Protection Agency
Washington, D.C. 20460

Sir:

Ford Motor Company, ("Ford"), as a petitioner seeking deferral of the effective date of the 80dB(A) noise emission standard (40 CFR §205.52(a)(ii)), has already submitted to the Agency data and comments pertinent to the proposed rule. Accordingly, Ford's current comments are brief.

We have reviewed the Notice of Proposed Rulemaking published June 19, 1985 (50 Fed. Reg. 25516), entitled "40 CFR Parts 202 and 205, Motor Carriers Engaged in Interstate Commerce; Noise Standards and Transportation Equipment Noise Emission Controls; Medium and Heavy Trucks." We concur with the proposal to defer the effective date of the 80dB(A) noise standard for newly manufactured medium and heavy duty trucks from January 1, 1986 to January 1, 1988. We further concur with the proposal to amend, effective October 15, 1985, the noise emission regulation for motor carriers involved in interstate commerce (in-use standards) to require 1986 and later model year medium and heavy duty trucks not to exceed exterior noise levels of: 83dB(A) at speeds of 35 MPH or less; 87dB(A) at speeds above 35 MPH; and 85dB(A) during stationary run-up.

We note the following technical matters which apparently require correction in the proposed rule:

1. The proposed rule states no effective date for the 85dB(A) stationary test limit (proposed new paragraph 202.21(b)). We suggest the following amendments to remedy this omission:

rec'd 8/7/85

Amend the proposed new sentence at the end of section 202.11 to read,

"The provisions of §202.20(b) and §202.21(b) of Subpart B shall become effective October 15, 1985."

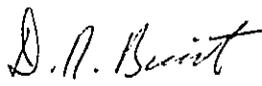
Amend proposed new paragraph 202.12(f) to read,

"(f) The provisions of §202.20(a) and §202.21(a) of Subpart B apply only to motor vehicles manufactured prior to the 1986 model year."

Amend proposed new paragraph 202.12(g) to read,

"(g) The provisions of Subpart B, §202.20(b) and §202.21(b), apply to all motor vehicles manufactured during or after the 1986 model year."

2. Proposed new paragraph 202.20(b) speaks of "condition of highway travel." In contrast, old paragraph 202.20(a), with which the proposed new paragraph is otherwise identical (except for the numerical value of the maximum permissible sound level), speaks of "condition of highway grade." We question whether this proposed change is intentional. For the sake of consistency in rule language, and because "travel" is less definite than "grade", we request that "travel" be changed to "grade" in proposed paragraph 202.20(b).



D. R. Buist