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Director, Standards & Regulations Division
U.S. Environmental Protection Agency
Washington, DC 20460

Attention: ONAC Docket 81-02 (Medium and Heavy Trucks) ANR - 490

Subject: Noise Emission Standards: Medium and Heavy Trucks and Truck Mounted Solid Waste Compactors

Dear Sir:

This letter is in response to the Environmental Protection Agency's letter of March 24, 1981, requesting comments on the 80 dbA noise regulation for medium and heavy trucks, as noted in Federal Register Notice 46 FR 17558, dated Thursday, March 19, 1981. As a major supplier of heavy duty intake and exhaust products to the trucking industry for more than 30 years, we welcome this opportunity to provide our comments. We believe this close association with the trucking industry, in addition to our participation in various technical societies and industrial organizations, as well as our work with federal, state, and local government agencies, provides us with a unique perspective on truck noise regulations.

The Donaldson Company has supported the trucking industry by providing the necessary engine intake and exhaust technology and products to comply with the 83 dbA regulation. Our development of products to assist the truck manufacturers in complying with the presently delayed 80 dbA regulation is essentially complete. These efforts have resulted in new technology and improved products that provide the needed (intake and exhaust noise reduced to 12-13 dbA below 80 dbA limit) engine intake and exhaust noise control. The new generation mufflers, for the most part, are lighter in weight than current mufflers with only a slight increase in size and backpressure, and with reasonable costs. For several engines, costs would be lower than comparable mufflers currently used for the 83 dbA trucks. In general, relative to present newly manufactured truck mufflers, the improved mufflers' costs would vary from a 10% decrease to a 45% increase with only a small population of Class VI diesel trucks requiring the latter. Therefore, from the Donaldson Company product standpoint, the 80 dbA limit does not impose undue stress on the trucking industry.

Of utmost importance is the establishment of a realistically attainable and preemptive federal truck noise limit that is cost beneficial. It is necessary for a healthy trucking industry that uniform regulations be

maintained. The 83 dbA, newly manufactured truck noise limit, in effect since January of 1978, was met with relatively few problems by the truck manufacturers. The health and welfare benefits to the public from this regulation are generally acknowledged. Considering the current economic condition of the trucking industry, and the impact of other than exhaust and intake related solutions, it perhaps is not appropriate at this time to implement the 80 dbA limit. This is not to say that the 80 dbA level should be abandoned, nor should the Environmental Protection Agency cease entirely its involvement and enforcement responsibilities. Anything less would bring about a multitude of conflicting state and local regulations... resulting in more expensive and, in many cases, ineffective efforts to control noise from interstate trucks at a local level.

If, after a thorough reevaluation by the Environmental Protection Agency, the proposed 80 dbA, newly manufactured truck noise limit is proven to be cost-benefit justifiable and in tune with environmental needs, we recommend the lower noise limit be implemented at a future date.

Regardless of the truck noise limits established, the trucking industry should be assured that these limits will remain in effect well into the foreseeable future. Any changes should take effect only after a proven need for quieter trucks has been demonstrated and appropriate regulations considered as authorized through additional congressional legislation.

We would also suggest that the current Interstate Motor Carrier Noise Emission Standards, CFR 40, Part 202, be reevaluated to ensure they are commensurate with newly manufactured truck limits and current tire noise technology... especially at highway speeds. Significant community benefit could be obtained from a reanalysis of this portion of the regulations and then setting the noise limit at something less than the present 90 dbA for new trucks operating at speeds above 35 mph.

We are only indirectly involved with the issue of noise limits for truck mounted solid waste compactors. Therefore, our only comment in this regard would be to, again, stress setting noise limits based on cost-justified benefits for all concerned.

In summary, we strongly believe that a uniform, newly manufactured truck noise regulation should be maintained. This regulation should be cost-benefit justifiable, with the Environmental Protection Agency continuing its administration of this program.

We appreciate this opportunity to respond to the Environmental Protection Agency's inquiry. If desired, we would be pleased to provide any additional information deemed necessary.

Sincerely,

Douglas W. Rowley
Chief Engineer, Acoustics Systems

Erland D. Anderson
Vice President, Engineering

DWR/jm