

U.S. ENVRONMENTAL PROTECTION AGENCY

CONTRACT NUMBER 68-01-4414

TECHNOLOGY, COSTAND ECONOMIC IMPACT ANALYSIS FOR THE REVISION OF THE INTERSTATE MOTOR CARRIER EMISSION REGULATIONS

WYLE LABORATORIES, INC.

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PROGRAM OBJECTIVES

PHASE I

REVIEW THE MOTOR CARRIER REGULATIONS APPLICABLE TO MOTOR CARRIER
 VEHICLES NOT SUBJECT TO NEW VEHICLE REGULATIONS

PHASE II

REVIEW THE MOTOR CARRIER REGULATIONS APPLICABLE TO MOTOR CARRIER
 VEHICLES SUBJECT TO NEW VEHICLE REGULATIONS

PHASE III

• REVIEW MAINTENANCE INSTRUCTIONS, LANGUAGE, REGULATIONS AND WARRANTIES OF NOISE SENSITIVE COMPONENTS

INTERSTATE MOTOR CARRIER REGULATION REVIEW

PHASE I

TASK 5

TASK 6

RAISED SPEED BRAKE

TASK 1

IDEN TIFICATION OF NEW DATA

TASK 2

REVIEW EPA NEW TRUCK REGULATION

TASK 3

IDENTIFICATION OF DISCREPANCIES

TASK 4

EFFECTS OF EXISTING REGULATIONS

TRACTOR TRAILER COMBINATIONS

TASK 7 LEVEL STREET ANALYSIS

TASK 8 HEALTH AND WELFARE IMPACT

INTERSTATE MOTOR CARRIER REGULATION REVIEW

PHASE II

TASK 1

TOTAL VEHICLE NOISE DEGRADATION

TASK 2

COMPONENT NOISE DEGRADATION

TASK 3

COMPONENT NO ISE VS MAINTENANCE AND OPERATION

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FAN CLUTCH EVALUATION

COMPONENT TAMPERING

TASK 5

TASK 4

INTERSTATE MOTOR CARRIER REGULATION REVIEW

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PHASE III

<u>TASK 1</u>

MAINTENANCE AND TAMPERING WARNINGS

TASK 2

COMMUNICATIVE EFFECTIVENESS

<u>TASK 4</u>

IDENTIFICATION OF NEEDED MAINTENANCE INSTRUCTIONS

TASK 5

EXECUTIVE SUMMARY

TASK 3

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LOCAL GOVERNMENT EXPERIENCE

PHASE I

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REVISION OF MOTOR CARRIER NOISE REGULATIONS APPLICABLE TO VEHICLES NOT SUBJECT TO NEW TRUCK NOISE REGULATIONS

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IDENTIFICATION OF NEW DATA

- OBJECTIVE: IDENTIFY AREAS WHERE NEW, REVISED OR EXPANDED DATA ARE AVAILABLE AS REVIEW INFORMATION FOR EXISTING INTERSTATE MOTOR CARRIER REGULATIONS
 - DETERMINE NUMBER OF VEHICLES AFFECTED BY MOTOR CARRIER REGULATIONS AS A FUNCTION OF KEY DESIGN PARAMETERS.
 - COLLECT, ORGANIZE, REVIEW RECENT TRUCK NOISE DATA AS ACCUMULATED BY BMCS, STATE OF CALIFORNIA, STATE OF FLORIDA, ETC.
 - COLLECT, ORGANIZE, REVIEW BUS NOISE DATA FROM ROADSIDE MEASUREMENTS, SAE J366b TESTS, ETC.
 - COMPILE, EVALUATE DATA ON SPEED DISTRIBUTION OF TRUCKS BEFORE AND AFTER INTRODUCTION OF NEW SPEED LIMIT.
 - COMPILE DATA ON HARDWARE, MAINTENANCE, AND OPERATION COSTS OF AVAILABLE RETROFIT TECHNOLOGY.

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- DEFINE MOTOR CARRIER TIRE USE PRACTICES APPLICABLE UNDER CURRENT AND FUTURE REGULATED CONDITIONS.
- COMPILE, REVIEW RECENT TRUCK TIRE NOISE AND TRACTION DATA.

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SUMMARY OF EFFORTS

- STATISTICS ON TRUCK POPULATION WILL BE AVAILABLE IN JUNE THROUGH 1977 CENSUS OF TRANSPORTATION; 1977 TRUCK SALES DATA ALREADY COMPILED
- TRUCK NOISE DATA SOURCES AVAILABLE:
 - RECENT DOT QUIET TRUCK REFERENCES
 - BUREAU OF MOTOR CARRIER SAFETY
 - STATE OF FLORIDA
 - 1977 WYLE TRUCK NO ISE SURVEY
- SYNOPSIS OF BUS DATA COMPLETED
- 1976 TRAFFIC SPEED DISTRIBUTION SAMPLES OBTAINED BY WYLE
- COSTS OF RETROFIT TECHNOLOGY EVALUATED IN CONCERT WITH PHASE II EFFORTS
- SUMMARY OF HEAVY TRUCK TIRE USE PRACTICES AVAILABLE FROM WYLE/DOT STUDY
- HSRI TIRE TRACTION DATA UNDER REVIEW

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			Scenario I	Number		
	1-1	1-2	1-3	1-4	1-5	1-6
Vehicles:	4×2 Tractor	4x2 Tractor	4x2 Tractor	6x4 Tractor	6x4 Tractor	6×4 Tractor
	2 Semitrailers	2 Semitrailers	2 Semitrailers	Tandem Axle Semitrailer	Tandem Axle Semitrailer	Tondem Axla Semitrailer
Tires:						
Steer Drive	Bias Rib Bias Rib	Bias Rib Bias Crossbar	Radial Rib Radial Rib	Bias Rib Bias Rib	Blas Rib Blas Crossbar	Radial Rib Radial Rib
Tire Prices (\$):						
Steer Drive Recap	150 150 42	150 173 42	185 185 42	150 150 42	150 173 42	185 185 42
Wear Rates: (Miles/32nd)						
Steer Driva Trailer	8,780 3,575 9,500	8,780 3,090 9,500	10,440 6,050 14,400	6,610 4,340 9,500	6,610 6,490 9,500	8,335 8,970 14,400
Pull Depth (in.):						
Steer Drive Trailer	6/32 5/32 2/32	8/32 6/32 2/32	4/32 4/32 2/32	4/32 2/32 2/32	4/32 4/32 2/32	4/32 2/32 2/32
Mileage Available per Trailer Tire	219,780	200,349	208, 590	323, 478	214, 155	328,846
Tire Use:	[]	[[(
Steer Drive	4.1 18.6	5.0 13.6	2.9 10.2	4.7 24.6	4.7	3.7 11.9
Cost per Mile	0.0035	0.0032	0.0030	0.0040	0.0028	0.0029

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SAMPLE OF TIRE LIFE CYCLE COST CALCULATIONS

REVIEW OF EPA BACKGROUND DOCUMENT FOR NEW TRUCK NOISE REGULATIONS -- MAINTENANCE, OPERATION, COST THEREOF

OBJECTIVE: UPDATE INFORMATION IN EPA MEDIUM AND HEAVY TRUCK NOISE EMISSION REGULATIONS REGARDING MAINTENANCE AND OPERA-TION, AND COST THEREOF, OF TRUCKS MEETING NEW TRUCK REGULATIONS

- COMPILE AND REVIEW MAINTENANCE/OPERATION MANUALS PUBLISHED BY VEHICLE MANUFACTURERS AND PARTS SUPPLIERS.
- REVIEW LITERATURE PUBLISHED SINCE EPA BACKGROUND DOCUMENT.
- SOLICIT INFORMATION DIRECTLY FROM VEHICLE OPERATORS.

SUMMARY OF EFFORTS

- MAINTENANCE MANUALS SOLICITED FROM:
 - GMC
 - FORD

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- FREIGHTLINER
- INTERNATIONAL HARVESTER
- ADDITIONAL MANUALS SUPPLIED BY EPA/ONAC ENFORCEMENT DIVISION
- PERTINENT DOCUMENTS FROM DOT QUIET TRUCK PROGRAM UNDER REVIEW

- COMMENTS ON COMPLIANCE COSTS ACQUIRED FROM MOTOR CARRIER
 OPERATIONS
- FURTHER DATA COMPILED IN CONCERT WITH PHASE II

IDENTIFICATION OF REGULATORY DISCREPANCIES

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OBJECTIVE: REVIEW/COMPARE ONAC BACKGROUND DOCUMENT FOR NEW TRUCK NOISE REGULATIONS AND OAWM DRAFT DOCUMENT FOR HEAVY ENGINE AIR EMISSION STANDARDS TO DETERMINE POTENTIAL DISCREPANCIES IN KEY TRUCK POPULATION AND ECONOMIC DATA.

- COMPARE VEHICLE POPULATION ESTIMATES.
- IDENTIFY DIFFERENCES IN GROWTH RATE ASSUMPTIONS AND FORECASTING METHODOLOGIES.
- IDENTIFY VARIATIONS IN BASIC COST INFORMATION.

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SUMMARY OF DOCUMENTS REVIEWED

Regulating Agency	Document	Publication Date
EPA Office of Noise Abatement and Control (ONAC)	 Background Document for Medium and Heavy Truck Noise Emission Regulations Noise Emission Standards for Medium and Heavy Trucks 	March 1976 April 13, 1976
EPA Office of	 Draft Environmental and Inflationary Impact Statement; Interim Heavy Duty Engine Regulations for 1979 and Later Model Years Environmental Impact Statement: 	April 21, 1976
Air and Waste Management (OAWM)	Emission Standards for New Light Duty Trucks	November 29, 1976
	3. <u>Revised Light Duty Truck</u> Regulations for 1979 and Later Model Years	December 28, 1976

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- SUMMARY OF RESULTS

- 1972 TRUCK POPULATION UNDERESTIMATED IN ONAC BACKGROUND DOCUMENT
- WIDE VARIATION AMONGST DOCUMENTS IN VEHICLE POPULATION GROWTH RATE ASSUMPTIONS
- OAWM PROVIDES LITTLE INSIGHT INTO TRUCK USE AND LIFE-CYCLE MODELS
- INSUFFICIENT EXAMINATION IN ALL DOCUMENTS OF PRICE ELASTICITY OF
 DEMAND

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EFFECTS OF EXISTING MOTOR CARRIER REGULATIONS

OBJECTIVE: ASSESS IMPACT OF INTERSTATE MOTOR CARRIER NOISE REGULATIONS BY REVIEWING EXPERIENCES OF REGULATORY AGENCIES AND MOTOR CARRIERS

- CONTACT STATE/LOCAL GOVERNMENTS REGARDING REGULATORY ACTIVITY AND ENFORCEMENT EXPERIENCE.
- REVIEW BMCS ENFORCEMENT EXPERIENCE.
- REVIEW COMPLIANCE EXPERIENCE OF MOTOR CARRIERS.

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SUMMARY OF EFFORTS

- REVIEWED/SUMMARIZED DATA FROM 15 STATES REGARDING:
 - EXPERIENCES WITH FEDERAL IMC NOISE REGULATIONS
 - EXPERIENCES WITH STATE OPERATIONAL REGULATIONS
 - MAJOR TYPES OF VIOLATIONS

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- PERCENT OF VEHICLES IN VIOLATIONS
- REVIEWED/SUMMARIZED SIMILAR DATA FROM SELECTED LOCAL GOVERNMENTS
- INTERVIEWED BMCS OFFICIALS REGARDING REGULATORY EXPERIENCES
- INTERVIEWED SELECTED MOTOR CARRIERS REGARDING COMPLIANCE EXPERIENCES

SUMMARY OF STATE TRUCK NOISE REGULATIONS

	Min. GW		Operational Regulations			New Truck Regulations									
	to which		Noise Limit				SAE Noise Limit in Year 19-					·			
State Regs. Apply (1000 lbs)	Effective Date	< 56 km/h	> 56 km/h	Other ⁽¹⁾	Degree of Enforcement(2)	68	72	73	74	75	76	77	78	Degree c Enforcemen	
United States	10	1975	86	90	-	+								83	-
California	6	1973	86	90	LS/82	+	88	86 .			83			80	+
Colorado	8	1975	80	82	ST/85	0			86	83	80				0
Connecticut	6 ⁽⁴⁾	1975	84 ⁽⁴⁾	88 ⁽⁴⁾	LS/82	+			90 ⁽³⁾		88 ⁽³⁾				+
Florida .	10	1975	86	90	-	+			86		[83		0
Hawali	6	1972	84 ⁽⁵⁾	84	-	+	To Be Adopted				1	0			
ldaho .	All Vehicles	Not Available	92 ⁽⁶⁾	92 ⁽⁶⁾	-	+	None				-				
ndiana	7	1974	89	90		0	None				*				
Varyland	10	1976	86	90	-	+				86	83	<u> </u>	•	80	+
Minesota	6	1975	86	90	-	+		88			86				0
Nebraska	10	1975	86	90	-	+	_	88	86		84				0
Nevada	6	1973	85	90	-	D		88	86						0
New York	All Vohicles	1975	88	88	ST/88	0	None				*				
Dregon	10	1976	B5 ⁽⁴⁾	87 ⁽⁴⁾	ST/88	0					86		83 ⁽⁴⁾		+
ennsylvania	7		90 ⁽⁷⁾	92 ⁽⁷⁾	-	0			90 ⁽⁷⁾			-+			0
Vashington	10	1975	86	90	ST/88	0					86			83	0
1) L5 - Level Street Standard (2) + - Heavy to Moderate				Moderate	(3) High	Speed Cruise-by Li	timi	ł	1	L	(6)	At 6, 1	meters (20 feet))

0 - Little or None

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ST - Stationary Runup Standard

🗕 🖛 Not Applicable 👘

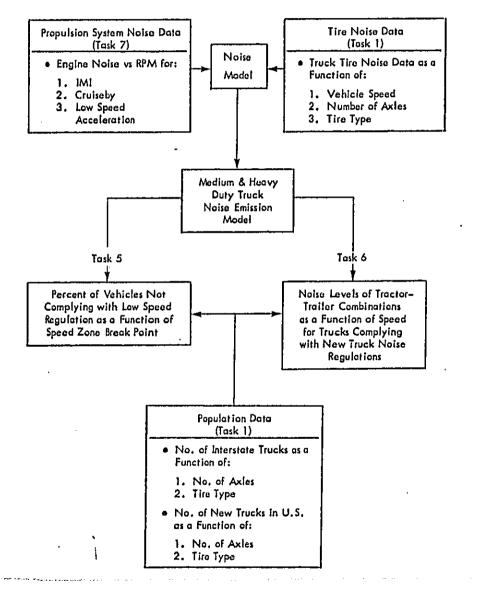
(4) Revised in 1976 to Conform with Federal Standards

(5) 73 dB at Night, Sundays, and on Holidays

(7) Presently Being Revised to Conform with Federal Standards

SUMMARY OF RESULTS

- MOTOR CARRIER COMPLIANCE EXPERIENCE:
 - 0 PERCENT HAVE HAD TO REBUILD/RETROFIT TRUCKS TO MEET INTERSTATE MOTOR CARRIER NOISE REGULATIONS.
 - 14 PERCENT HAVE HAD TO REBUILD/RETROFIT TRUCKS TO MEET INTERIOR NOISE STANDARDS.
 - 71 PERCENT USE FAN CLUTCHES AND 62 PERCENT USE RADIAL TIRES FOR FUEL ECONOMY REASONS.
 - 0 PERCENT HAVE INCURRED ADDITIONAL MAINTENANCE COSTS RESULTING FROM VOLUNTARY RETROFITTING.
 - 39 PERCENT HAVE NEVER BEEN STOPPED FOR COMPLIANCE CHECK.
 - 90 PERCENT REPORT NO VIOLATIONS,



INTERRELATIONSHIP OF TASKS 5, 6, AND 7

WYLE TRUCK NOISE EMISSION MODEL

- MODEL ESTIMATES STATISTICAL NOISE LEVEL DISTRIBUTION FOR MEDIUM
 AND HEAVY TRUCK NATIONAL POPULATION.
 - LOW SPEED MODEL (PROPULSION NOISE)
 - HIGH SPEED MODEL (PROPULSION AND TIRE NOISE)
- MODEL DEVELOPMENT BASED UPON:
 - SAN ONOFRE WEIGH STATION MEASUREMENTS (TASK 7)
 - CONTROLLED TESTS
 - OTHER DATA SOURCES
- DISTRIBUTION OF NOISE LEVELS DEPENDENT UPON:
 - ENGINE RPM
 - ENGINE LOAD
 - VEHICLE SPEED (FOR HIGH SPEED CASE)
 - TRUCK CLASSIFICATION (NO. OF AXLES, GVWR, ETC.)
- MODEL DIRECTLY APPLICABLE TO DETERMINING PERCENT VEHICLES
 NOT COMPLYING TO ALTERNATIVE REGULATED CONDITIONS

RAISED SPEED BREAK

OBJECTIVE: ASSESS PERCENT OF VEHICLES OUT OF COMPLIANCE IF SPEED BREAK RAISED FROM 56 kmh (35 mph) TO 64 kmh (40 mph) OR 72 kmh (45 mph).

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- CALCULATE PERCENT OF VEHICLES OUT OF COMPLIANCE USING WYLE NOISE EMISSION MODEL AND VEHICLE POPULATION DATA.
- IDENTIFY HARDWARE MODIFICATIONS/CHANGE IN TIRE USE PRACTICES NECESSARY TO MEET STANDARD BASED UPON RAISED SPEED BREAK.

TRACTOR-TRAILER COMBINATIONS

OBJECTIVE: ESTIMATE NOISE EMISSIONS OF SPECIFIED TRACTOR-TRAILER CONFIGURATIONS AS A FUNCTION OF SPEED

- CALCULATE NOISE LEVELS OF TRACTOR-TRAILER COMBINA-TIONS AT 56, 64 AND 72 kmh (35, 40 AND 45 mph) USING WYLE NOISE EMISSION MODEL.
- ASSESS EFFECTS OF ALTERNATIVE TIRE USE PRACTICES.

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LEVEL STREET ANALYSIS

OBJECTIVE: ASSESS POTENTIAL FOR REGULATING TRUCK NOISE EMISSIONS UNDER URBAN STREET OPERATING CONDITIONS

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- EXECUTE CONTROLLED TESTS TO MEASURE DIFFERENCE IN TRUCK NOISE LEVELS FOR ACCELERATION AND CRUISE.
- PERFORM NOISE SURVEY OF MEDIUM/HEAVY TRUCKS TO DETERMINE DISTRIBUTION OF NOISE EMISSION LEVELS.
- ASSESS FEASIBILITY OF "61m (200 ft.) FROM INTERSECTION" RULE.
- EVALUATE NUMBER OF EXISTING REGULATED VEHICLES THAT COULD MEET LOWER LEVEL STREET NOISE STANDARD.

	TASK 7		
SUMMARY OF SA	N ONOFRE NOISE MEA	SUREMENTS	
NUMBER OF VE	HICLES MEASURED:		
• GASOLI	NE MEDIUM DUTY		= 24
	HEAVY DUTY		= 3
• DIESEL	MEDIUM DUTY	:	= 14
	HEAVY DUTY	i	= 83
		TOTAL	124
AVERAGE (MEAI	NOISE LEVELS:		
GASOLI	NE MEDIUM DUTY	77	.6 dBA
	HEAVY DUTY	-	~~
• DIESEL	MEDIUM DUTY	81	.2 dBA
	HEAVY DUTY	82	.8 dBA

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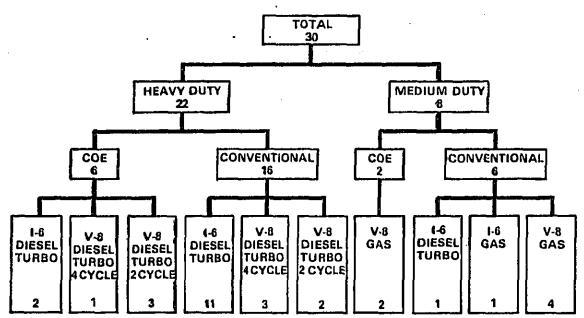
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PHASE II TASK 1 **OBJECTIVE:** COLLECT NOISE DEGRADATION DATA ON TOTAL VEHICLE TEST PROGRAM APPROACH: PRIMARILY STATIONARY (IDLE-MAX-IDLE) TESTING . PASS-BY TESTING IN-CAB NOISE MEASUREMENT STATIONARY TESTING WITH EXHAUST GAS NOISE DUCTED AWAY FACTORY TESTING; STATIONARY AND PASS-BY LITERATURE SEARCH AND MANUFACTURER CONTACTING TEST PROGRAM ACCOMPLISHMENTS: THIRTY TRUCKS IN TEST FOUR HAVE COMPLETED TEST #3 ELEVEN HAVE COMPLETED TEST #2 THIRTY HAVE COMPLETED TEST #1 OTHER PROGRAMS INTERNATIONAL HARVESTER MVMA PERFORMED BY WYLE





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SUMMARY OF OBSERVED CHANGES IN AVERAGE NOISE LEVEL WITH CUMULATIVE KILOMETERS SOURCE: WYLE REPORT TO MVMA

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APPROXIMATE KILOMETERS COMPLETED	N UMBER OF VEHICLES	AVERAGE CHANGE FROM INITIAL VALUE (dB)	STANDARD DEVIATION (dB)	PROBABILITY THAT CHANGE WAS DUE TO CHANCE (%)
16,000	8	+0,4	1.1	35
32,000	7	+0.5	1.0	30
48,000	7	+0.2	1.1	60
64,000	4	-0.2	1.7	80

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VEHIC LE NUMBER	PASS-BY		Δ	IMI		
	FACTORY	WYLE	dB	FACTORY	WYLE	dB
2	81.0	79.9	- 4 .1	80.0	80.6	+0.6
3	83.0	84.2	+1.2	84.0	85.1	+1.1
4	82.0	79.4	-2.6	81.0	80.6	-0.4
5	83.0	82.5	-0.5	85.0	84.8	-0.2
19				78.1	77.0	-1.1
20				78.8	77,5	-1.3
27				78.5	78.2	-0.3
28				77.9	78.0	+0,1

FACTORY DATA VS. WYLE DATA LA

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PHASE II TASK 2 OBJECTIVE: COLLECT NOISE DEGRADATION DATA ON TRUCK COMPONENTS EXPERIMENTALLY AND FROM LITERATURE APPROACH: TEST PROGRAM • USE SAMPLE OF TRUCKS FROM TASK 1, TOTAL VEHICLE NOISE DEGRADATION • STATIONARY TESTING USING FOLLOWING CONFIGURATION: ENGINE ONLY ENGINE PLUS FAN ENGINE PLUS FAN ENGINE PLUS EXHAUST ENGINE PLUS INTAKE LITERATURE SEARCH AND MANUFACTURER CONTACT

ACCOMPLISHMENTS: TEST PROGRAM

- ONE VEHICLE COMPLETED TEST #2
- TWO VEHICLES COMPLETED TEST #1

LITERATURE SEARCH

- QUIET TRUCK PROGRAM, IH, WHITE, FREIGHTLINER, DONALDSON, STEMCO, PACCAR, MC DONNELL DOUGLAS
- COMPONENT MANUFACTURERS FAN, MUFFLER, ENGINE

	PHASE II TASK 3
OBJECTIVE:	EVALUATE VEHICLE AND COMPONENT NOISE DEGRADATION AS RELATED TO PROPER MAINTENANCE AND OPERATION
APPROACH:	 PROCURE MANUFACTURERS MAINTENANCE AND OPERATION MANUALS REVIEW MAINTENANCE AND OPERATION OF IN TEST VEHICLES LITERATURE SEARCH COUPLED WITH MANUFACTURERS AND USER SURVEY
ACCOMPLISHMENT:	 SOME MAINTENANCE MANUALS RECEIVED FROM MAJOR MANUFACTURERS ACCUMULATING DATA ON TEST VEHICLES. RECORDS REVIEWED WHEN VEHICLES ARE TESTING LIMITED DATA PROCURED FROM LITERATURE AND COMPONENT MANUFACTURERS

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PHASE II TASK 4 DETERMINE EFFECTS ON TOTAL VEHICLE NOISE AS A RESULT OF **OBJECTIVE:** TAMPERING OR COMPONENT REPLACEMENT MUFFLER SUBSTITUTION AND NOISE PANEL REMOVAL DONE APPROACH: . EXPERIMENTALLY LITERATURE SEARCH AND VENDOR CONTACT ACCOMPLISHMENTS: THREE TRUCKS TESTED . LITERATURE SEARCH INDICATES EXHAUST SYSTEM DEGRADATION . IS PRIMARY PROBLEM

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CHANGE IN NOISE LEVELS (L_A) RESULTING FROM MUFFLER SUBSTITUTION

	MUFFLER CONFIGURATION							
VEHICLE NUMBER	FACTORY	SUBSTITUTE 1	SUBSTITUTE 2	SUBSTITUTE 3	SUBSTITUTE 4	MAXIMUM INCREASE (dB)		
#7 MEDIUM DUTY V-8 GAS 28,000 KILOMETERS	79.9	- 79.7	82.5	DID NOT FIT		+2.6		
#40 HEAVY DUTY V-8 DIESEL 4-CYCLE TURBO 90,000 KILOMETERS	85.8	86,1	85.9	86.2	86.2	+0.4		
#41 HEAVY DUTY V-6 DIESEL 2-CYCLE TURBO 54,000 KILOMETERS	81.7	81.9	84.9	80.4	83.5	+3.2		

PHASE II TASK 5 EVALUATION OF FAN CLUTCHES TO DETERMINE EFFECTS UPON TRUCK **OBJECTIVE:** NOISE DEGRADATION APPROACH: LITERATURE SEARCH TRUCK MANUFACTURER AND COMPONENT MANUFACTURER CONTACT FAN CLUTCH PROJECTED USAGE PREVIOUS OR PRESENT TEST PROGRAMS POSSIBLE FAILURE RATE NOISE LEVEL REDUCTION RESULTING FROM USE TYPES OF MODIFICATIONS OR REMOVALS ANTICIPATED OR EXPERIENCED ACCOMPLISHMENTS: ESTIMATED USAGE 52% CLASS 7 AND 8 BY 1978 90% CLASS 7 AND 8 BY 1982 SOME GUARANTEE 250,000 MILES OPERATION MOST RECENT TESTS RUN BY RCCC IN ST. LOUIS

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TAMPERING OR CONTINUOUS ON MODE MAY CAUSE FAILURE

PHASE III TASK 1

OBJECTIVE: CATALOG DOMESTIC AND FOREIGN MAINTENANCE INSTRUCTIONS AND TAMPERING WARNINGS ON NOISE SENSITIVE COMPONENTS

APPROACH: • REVIEW AND SUMMARIZE LISTS OF REQUIRED MAINTENANCE FOR NOISE SENSITIVE COMPONENTS AND TAMPERING LISTS SUBMITTED TO THE NOISE ENFORCEMENT OFFICE

REQUEST INFORMATION FROM MANUFACTURERS ON THEIR EXPERIENCE
 WITH THE INTERSTATE MOTOR CARRIER REGULATIONS

OBTAIN COPIES OF MANUALS SPECIFICALLY WRITTEN FOR MAINTENANCE
 OF NOISE EMISSION CONTROL SYSTEMS

ACCOMPLISHMENTS: • QUESTIONS AND REQUESTS ARE BEING FORMULATED FOR INQUIRIES TO BE SUBMITTED TO THE MANUFACTURERS

> REQUESTS HAVE BEEN MADE TO THE MANUFACTURERS PRESENTLY INVOLVED IN OUR PROGRAM FOR COPIES OF NOISE EMISSION CONTROL SYSTEM MANUALS THAT THEY SUPPLY TO TRUCK OWNERS

PHASE III TASK 2

OBJECTIVE:

- DETERMINE COMMUNICATIVE EFFECTIVENESS OF EXISTING MAINTENANCE INSTRUCTIONS, WARRANTIES OR TAMPERING WARNINGS FROM TRUCK MANUFACTURERS, OPERATORS AND ENFORCEMENT PERSONNEL
- DEVELOP RECOMMENDATIONS FOR METHOD OF INFORMATION COMMUNICATION FOR WARRANTIES, MAINTENANCE INSTRUCTIONS AND TAMPERING WARNINGS

APPROACH:

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- PHONE, WRITTEN AND PERSONAL COMMUNICATION WITH MANUFACTURERS, OPERATORS AND ENFORCEMENT PERSONNEL TO ASK ABOUT THEIR EXPERIENCE WITH EXISTING MAINTENANCE INSTRUCTIONS, WARRANTIES OR TAMPERING WARNINGS REGARDING NOISE CONTROL DEVICES COVERING THE FOLLOWING:
 - LANGUAGE
 - FORMULATIONS MOST EFFECTIVE
 - RESEARCH PLANNED FOR INSTRUCTIONS OR LABELING
 - EXPERIENCE REGARDING LABEL LOCATION
 - EXPERIENCE REGARDING USE OF SYMBOLS AND COLORS

ACCOMPLISHMENTS: • THIS TASK IS IN PLANNING STAGE

PHASE III TASK 3 REVIEW AND ANALYZE ALL PLANNED STATE, LOCAL OR FOREIGN WARRANTY OBJECTIVE: ٠ OR MAINTENANCE INSTRUCTION REGULATIONS OR REQUIREMENTS CONTACT ALL STATE AND MANY SELECTED LOCAL GOVERNMENTS AND APPROACH: 0 FOREIGN GOVERMENTS REGARDING INFORMATION ON EXISTING OR PLANNED REGULATIONS OR REQUIREMENTS ON WARRANTY, MAINTENANCE INSTRUCTIONS AND TAMPERING WARNINGS AND ANY EXISTING ASSOCIATED EXPERIENCE ACCOMPLISHMENTS: STATE AND LOCAL GOVERNMENT CONTACTS HAVE BEEN ESTABLISHED DURING PHASE I. THESE CONTACTS PLUS OTHERS WILL BE APPROACHED FOR INFORMATION

REQUIRED FOR THIS TASK. FIFTEEN STATES AND SEVENTEEN LOCAL GOVERNMENTS RESPONDED TO OUR QUESTIONS DURING PHASE I

PHASE III TASK 4

OBJECTIVE:

IDENTIFY EQUIPMENT AND COMPONENTS WHICH SHOULD BE SUBJECT TO WARRANTIES, SPECIAL MAINTENANCE INSTRUCTIONS AND/OR TAMPERING WARNINGS

APPROACH:

- USE INFORMATION FROM TASK 4 (COMPONENT SUBSTITUTION AND TAMPERING) OF PHASE II AS BASIS FOR ANALYSIS
- SUPPLEMENT WITH INFORMATION GATHERING FROM MANUFACTURERS, OPERATORS AND ENFORCEMENT PERSONNEL ON ASSESSMENT OF PREMEDITATED AND ACCIDENTAL TAMPERING OF NOISE CONTROL OR NOISE SENSITIVE COMPONENTS
- INFORMATION REQUESTS WILL BE COMBINED WITH TASK 1 AND TASK 2 INQUIRIES TO MANUFACTURERS, OPERATORS AND ENFORCEMENT PERSONNEL
- ACCOMPLISHMENTS: TYPE OF INFORMATION NEEDED IS BEING FORMULATED BASED UPON RESULTS OF PHASE II, TASK 4

PHASE III TASK 5

OBJECTIVE:

- PREPARATION OF EXECUTIVE SUMMARY REPORT WITH SPECIFIC RECOMMENDATIONS FOR EPA ACTION, FORMULATING TEXTS OF WARRANTIES, MAINTENANCE INSTRUCTIONS AND TAMPERING WARNINGS
 - RECOMMENDATIONS WILL ALSO BE MADE, WHERE APPROPRIATE, ON THE BEST LOCATION OF AFFIXING LABELS AND WARNINGS AND THE USE OF SYMBOLS AND COLORS

ACCOMPLISHMENTS: • REPORT WILL FOLLOW THE COMPLETION OF TASKS 1 THROUGH 4