

RECEIVED 7/24/85
Replaces submission of 7/19/85
per attachment A.

NTDRA

DOCKET # OPMO-0184
ITEM # 43

NATIONAL TIRE DEALERS & RETREADERS ASSOCIATION, INC.
Suite 400, 1250 Eye Street, N.W., Washington, D.C. 20005 (202) 789-2300 (800) 368-5757

July 19, 1985

n-96-01
II-A-980

Mr. Charles Elkins
Assistant Administrator (Actg.)
Office of Air and Radiation (AR-471C)
Docket No. OPMO-0184
U.S. Environmental Protection Agency
Washington, D.C. 20460

The National Tire Dealers and Retreaders Association, representing nearly 5,200 independent tire dealers and retreaders nationwide, wishes to take this opportunity to go on record with our concerns regarding 40 CFR Part 202, Section 202.20 -- the proposed rulemaking governing noise emission control for motor carriers in excess of 10,000 pounds engaged in interstate commerce.

While NTDRA appreciates the U.S.-E.P.A.'s interest in assisting the new truck manufacturers in economically complying with the MHT 80 dB noise standard, our association seeks to avoid an unfair shifting of their burden to truck owners and operators as well as to the tire dealers and retreaders who supply their needs. In this regard, we urge caution concerning the proposed amendment calling for a 50 percent reduction in the current "not to exceed" noise limits for some in-use carriers (1986 and later models).

NTDRA hopes that you will consider the possible effects of this proposed rule upon our membership. Applying this amendment to some in-use vehicles (1986 and later models) may threaten tire dealers with reduced sales of those tires in their inventory having aggressive crossbar tread patterns -- tires, upon which truckers have come to rely for their road handling ability in mud and snow. Similarly, this economic loss could be extended to those retreaders across the country who rely upon the mold-cured method of production. They possibly could be faced with curtailed use of their current crossbar tread design matrices and the need to acquire new ones so that their customers, the nation's truck owners and operators, can comply with the proposed noise emission standard. Such developments, of course, could be disruptive and costly to an industry which is already operating often-times on the financial margin.

President HAROLD L. COKER President Elect LOUIS KARRAS 1st Vice President ER. BROWN 2nd Vice President DON PERRY Treasurer JOE DePAOLIS Corporate Secretary JOHN SHIMER Executive Vice President PHILIP P. FRIEDLANDER, JR.

rec'd 8/1/85

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These potential repercussions, we feel, warrant further study by the U.S.-E.P.A. before a final rule is issued on the allowable in-use noise emission levels for 1986 and later model year motor carriers engaged in interstate commerce. We thank you for the opportunity to express this association's concern, and we commend your efforts to reduce the nation's noise pollution level.

Sincerely,



Donald T. Wilson
Director, Government Relations

DTW/lms

ATTACHMENT A

RECEIVED 7/24/85 *RA*

NTDRA

NATIONAL TIRE DEALERS & RETREADERS ASSOCIATION, INC.
Suite 400, 1250 Eye Street, N.W., Washington, D.C. 20005 (202) 789-2300 (800) 368-5757

July 24, 1985

Mr. Charles Elkins
Assistant Administrator (Actg)
Office of Air and Radiation (AG-471C)
Docket No. OPMO-0184
U.S. Environmental Protection Agency
Washington, D.C. 20460

Dear Mr. Elkins:

This letter is to inform you that NTDRA inadvertently submitted an earlier draft of its intended comments for the record (dated July 19, 1985) concerning the EPA's proposed rulemaking on noise emission (specifically, 40 CFR Part 202, Section 202.20).

With the agreement of Mr. Kenneth E. Feith, NTDRA is today exchanging this erroneous submission with the originally intended comments.

I wish to thank the EPA for its cooperation in correcting this oversight on our part.

Sincerely,



Donald T. Wilson
Director, Government Relations

President
HAROLD L. COKER

President Elect
LOUIS KARRAS

1st Vice President
E.R. BROWN

2nd Vice President
DON PERRY

Treasurer
JOE DePAOLIS

Corporate Secretary
JOHN SHIMER

Executive Vice President
PHILIP P. FRIEDLANDER, JR.