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Docket # OPMD-0184
ITEL # 41



RUBBER MANUFACTURERS ASSOCIATION
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July 18, 1985

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

SUBJECT: 40 CFR Parts 202 and 205
(FRL 2818-4)
Motor Carriers Engaged in Interstate Commerce
Noise Standards and Transportation Equipment
Noise Emission Control; Medium and Heavy Trucks

Gentlemen:

On behalf of domestic manufacturers of tires, the Rubber Manufacturers Association (RMA) hereby submits its comments concerning the subject proposed rulemaking. We have no comments concerning Part 205 proposed amendments, but we are concerned with proposed amendments to the requirements for vehicles in use in Part 202, Section 202.20.

The industry is opposed to revising the limit for 90 dB(A) to 87 dB(A) for vehicle measurements using fast meter response on an open site at 50 feet from the centerline of lane of travel on highways with speed limits of more than 35 mph. When the motor carrier regulations for noise were originally instituted, there was a problem with compliance for a substantial number of trucks. The reasons it has not been a problem in recent years is the apparent reduction of new truck generated sounds accomplished by original equipment vehicle manufacturers; the elimination of "pocket" tread designs; and the application of sound levels reduction technology by tire manufacturers.

A significant portion of currently manufactured conventional crossbar tires used on trucks of 10,000 GVWR and over could be expected to generate in the worn condition sound levels in the range of 84 to 87 dB(A) when driven at highway speeds, particularly on tandem axle trucks. Retreaded tires may generate sounds somewhat higher.

It is probable that trucks that have traveled hundreds of thousands of miles and that were originally manufactured when the maximum limit was 83 dB(A) will generate 82 dB(A) or even higher levels not including tire noise. If an 82 dB(A) truck had mounted thereon eight evenly worn cross-

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bar tires that generated 86 dB(A) on the open road, the resultant total vehicle sound level including tires would be approximately 87.5 dB(A). Unevenly worn crossbar tires might generate even higher sound levels. To use another example, if an 80 dB(A) truck without tire noise had mounted thereon eight evenly worn 86 dB(A) crossbar tires, the resultant total vehicle sound level including tires at the upper levels of highway speeds would be 87 dB(A).

We believe that the demand for conventional design crossbar tires will continue for the foreseeable future. Many drivers insist on crossbar tires, particularly for winter and wet road conditions. Therefore, we believe that the reduction in allowable in-use sound level from 90 dB(A) to 87 dB(A) should only be made to apply to trucks made under the 80 dB(A) new-truck limit.

We consider it unreasonable to reduce the allowable sound generation level for vehicles in use to 87 dB(A) (a 50% reduction from the present allowable sound power level) when the maximum sound generation level below 35 mph (which is essentially truck sound exclusive of tires) remains at 83 dB(A).

Sincerely,


Frank E. Timmons
Deputy Director
Tire Division

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