

81-02-54L



A-96-01

II-A-1088

USG 350-81-12
Environmental Activities Staff
General Motors Corporation
General Motors Technical Center
Warren, Michigan 48090

June 3, 1981

Mr. Kenneth E. Feith
Standards and Regulations Division (ANR-490)
Office of Noise Abatement and Control
U.S. Environmental Protection Agency
Crystal Mall Building
1921 Jefferson Davis Highway
Arlington, VA 22202

Dear Mr. Feith:

Noise Cost Data re Rescission of the January 1, 1983
80 dB Noise Emission Standard for Medium and Heavy Trucks

In response to your letter dated May 5, 1981, which was addressed to
Mr. Donald H. McPherson, the following additional information is
provided:

Cost of 80 dB Noise Regulation

In the General Motors comments dated April 21, 1981 (USG 350-81-9)
we provided a figure of \$365 as the average price increase per truck
to go from an 83 dB regulated level to an 80 dB level. This is a
sales weighted average figure and in order to give EPA further insight
as to the economics of noise control, a further breakdown by truck
type is provided.

Total Industry	Medium Duty		Heavy Duty (Diesel)		Total Truck Sales Seven Years*
	Gasoline	Diesel	Conventional	Tilt	
----- (Units 000's) -----					
Seven Year Forecast Fleet Volume	214	300	1,631	383	2,528
----- (\$ Per Truck) -----					
Initial Cost to Consumer	50	300	415	400	Average Truck Price Increase* 365
Lifetime Service Requirements	105	1,575	1,105	2,100	1,225
TOTAL	155	1,875	1,520	2,500	1,590

*Previously provided to EPA

34RD ANR-490

14: 52

The EPA has correctly assumed that not all trucks would require \$365 of hardware to achieve an 80 dB level. For gasoline powered medium duty trucks, which represent a small and diminishing segment of the affected fleet, a consumer cost of only \$50 would be required, primarily to add viscous clutch fans. However, for diesel powered trucks in all categories, various engine quieting techniques, such as thicker castings, sound baffles and special isolated oil pans and valve covers would be required as would heavy-duty dual exhaust systems and, in most cases, sound insulating shields for the engine and transmission. The costs for diesel vehicles range typically from \$300 to \$415. It should be noted that diesel-powered vehicles are increasing in sales.

Lifetime Service Costs

The cost of servicing these vehicles throughout their lifetimes would be increased by the necessity to remove and replace noise shields to access actual service points. Furthermore, the cost of replacement parts such as the heavy-duty dual exhaust systems and isolation gaskets would increase substantially from their present day counterparts. Actual United Parcel Service field experience with trucks incorporating similar noise reduction features supports these estimates of incremental service cost.

These estimates are based on technical requirements determined by actual prototype testing and subsequent production releases. We have previously provided EPA with a description of the technical requirements. Because the hardware definitions are based on actual test programs, we consider the requirements to be firm.

With regard to the EPA request for component noise levels before and after test, we regret that we are not in a position to provide this detailed information. Furthermore, we do not consider it germane to the question of cost of noise control.

We hope the above additional information will satisfy your requirement. If we can be of further assistance, please contact the undersigned.

Sincerely,

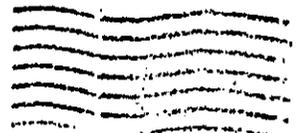


Paul P. Pataky
Assistant Staff Engineer
International Regulations

P. P. Pataky
Environmental Activities Staff



General Motors Corporation
General Motors Technical Center
Warren, Michigan 48090



Camellia USA 8c

Mr. Kenneth E. Feith
Standards & Regulations Div. (ANR-490)
Office of Noise Abatement and Control
U.S. Environmental Protection Agency
Crystal Mall Building
1921 Jefferson Davis Highway
Arlington, VA 22202