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Docket # OPMO - 0184
ITEM 38



INTERNATIONAL HARVESTER
July 17, 1985

n-96-01

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Assistant Administrator
Office of Air and Radiation
Docket No. OPMO-0184
U.S. Environmental Protection Agency
Washington, DC 20460

Motor Carriers Engaged in Interstate Commerce
Noise Standards and Transportation Equipment Noise Emission Controls
Medium and Heavy Trucks
Docket FRL 2818-4

Gentlemen:

International Harvester (IH) is pleased to file the following comments in support of the Agency's proposal published in the Federal Register on June 19, 1985. The proposal would:

1. Delay the effective date from January 1, 1986 to January 1, 1988 for implementation of the 80 dB(A) noise standard for newly-manufactured medium/heavy trucks; and,
2. Upgrade the current interstate motor carrier requirements to be compatible with the current 83 dB(A) standard for vehicles manufactured after January 1, 1986.

We concur with the Agency's conclusion that the proposed changes will accomplish the original intent of coinciding implementation of the 80 dB(A) noise standard with the heavy duty NOx/Particulate standards that were published by the Agency on March 15, 1985. Further, that the proposed action will have no significant adverse impact on health and welfare considerations.

The Agency's expedient promulgation of this proposal as a final rule is of critical importance to IH. In anticipation that the Agency intends to grant the two-year delay and to avoid unnecessary costly financial expenditures, we have for some period of time been withholding production release of vehicle hardware effects that would have been required to bring our product line into full compliance by January 1, 1986. Since EPA's issuance of this proposal has been delayed considerably longer than anticipated, IH is no longer in a position of being able to achieve compliance by January 1, 1986. We therefore must continue to assume that the 80 dB(A) standard will be delayed to January 1, 1988 in line with the substantive reasons outlined in the Agency's proposal.

Respectfully,

F. L. Krall
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rec'd 8/5/85