



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
NATIONAL VEHICLE AND FUEL EMISSIONS LABORATORY  
2565 PLYMOUTH ROAD  
ANN ARBOR, MICHIGAN 48105-2498

OFFICE OF  
AIR AND RADIATION

**MEMORANDUM**

SUBJECT: Correction to Tables in the Draft Technical Support Document for the Non-Conformance Penalty Rulemaking

FROM: Charles Moulis  
Assessment and Standards Division

TO: Docket A-2001-25

DATE: January 18, 2002

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The Environmental Protection Agency published and placed in the docket for this rulemaking (#A-2001-25-III-B-01) a Draft Technical Support Document (EPA420-D-02-001) as part of its Notice of Proposed Rulemaking "Control of Air Pollution From New Motor Vehicles and New Motor Vehicle Engines; Proposed Non-Conformance Penalties for 2004 and later Model Year Emission Standards for Heavy-Duty Diesel Engines and Heavy-Duty Diesel Vehicles". The fixed costs in Tables 3-3 and 3-4 of that document are incorrect due to an administrative error. The corrected tables are attached. This correction only affects the Draft Technical Support Document. No changes are necessary to the proposed regulations as a result of this correction. The proposed values for COC<sub>50</sub> and COC<sub>90</sub> were based on the numbers in these corrected tables.

**Table 3-3  
Engine Manufacturer Cost Submissions for Medium-Heavy Service Class**

<b>Cost Category</b>	<b>Manufacturer Data - per Engine Costs</b>				
Fixed Costs (\$/engine)	no estimate provided	\$297	\$353	\$766	\$995
Hardware Costs, includes engine manufacturer markup	\$223	\$433	\$750	\$793	\$1,500
Warranty	unknown at this time	\$0	\$10	\$10	\$765
Operating Costs (excluding fuel economy impacts)	\$0	unknown at this time	unknown at this time	\$1,672	estimate not releasable*
Lost Revenue due to increased engine weight	no estimate provided	no estimate provided	no estimate provided	no estimate provided	\$196
Fuel Consumption Impact	no change	unknown at this time	3% worse	4 to 5% worse	5% worse
Vehicle Manufacturing Cost (\$/engine) includes vehicle manufacture markup	\$0	unknown at this time	unknown at this time	\$100	\$155

\* Detailed inputs provided on change in oil change intervals, demurrage (i.e., down time), repairs outside the warranty period, and revenue impacts from increased engine weight, but manufacturer did not allow cost estimate to be placed in the public record.

**Table 3-4  
Engine Manufacturer Cost Submissions for Heavy-Heavy Service Class**

<b>Cost Category</b>	<b>Manufacturer Data - per Engine Costs</b>				
Fixed Costs (\$/engine)	\$273	\$407	\$516	\$1,013	\$1,775
Hardware Costs, includes engine manufacture markup	\$1,100	\$1,169	\$1,972	\$2,053	\$2,899
Warranty	\$0	\$23	\$188	\$360	\$1,680
Operating Costs: (excluding fuel economy impacts)	\$0	\$0	unknown at this time	\$429	estimate not releasable*
Lost Revenue due to increased engine weight	no estimate provided	no estimate provided	no estimate provided	no estimate provided	\$871
Fuel Consumption Impact	no change	2 percent worse	2.5 percent worse	3 percent worse	3 to 5 percent worse
Vehicle Manufacturing Cost (\$/engine), includes vehicle manufacture markup	\$150	\$195	\$250 to \$350	\$408	\$500

\* Detailed inputs provided on change in oil change intervals, demurrage (i.e., down time), repairs outside the warranty period, and revenue impacts from increased engine weight, but manufacturer did not allow cost estimate to be placed in the public record.