

**GROVE MANUFACTURING COMPANY**  
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**KIDDE**

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81-02-33

N-96-01  
II-A-1067

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Ref: PSR-4283

April 23, 1981

Director,  
Standards and Regulations Division  
U.S. Environmental Protection Agency  
Washington, D.C. 20460

Attention: ONAC Docket 81-02 (Medium & Heavy Trucks)  
ANR-490

Subject: 40 CFR Part 205 (NH FRL 1782-7)  
Noise Emission Standards - Medium and Heavy  
Trucks and Truck Mounted Solid Waste Compactors

Sir:

Responding to your request for "comments on whether or not to rescind the 80 dB noise standard regulation for heavy and medium trucks".

Grove Manufacturing Company respectfully takes this opportunity to request rescission of the 80 decibel (dB) noise emission regulation for heavy and medium trucks. Grove is a "related manufacturing industry" which designs and manufactures truck driven and carrier mounted hydraulic cranes.

Our request for rescission of this regulation is based on the following considerations:

1. Type of Product - Minimum highway travel time, i.e., frequency and distance to work sites. Work site environment (normally construction related activity) with craning work functions performed.
2. Regulations which upon later evaluation involve costs which bear no reasonable relationship to the actual benefits derived from specific industry related products.
3. Finally, the costs to comply with the lower 80 dB noise level may impose significant and perhaps unwarranted economic burdens upon our industry.



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U.S. Environment  
Protection Agency

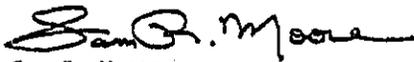
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Your attention and consideration in this matter will be greatly appreciated. Should additional information, be necessary, please advise.

Sincerely,

GROVE MANUFACTURING COMPANY



Sam R. Moore  
Product Safety & Reliability  
Engineer

SRM/cdw

