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April 15, 1981

Director, Standards & Regulations Division  
Attention: ONAC Docket 81-02 (Medium and Heavy Trucks)  
ANR-490  
U. S. Environmental Protection Agency  
Washington, D. C. 20460

Gentlemen:

In response to your request for comments pertaining to the possible rescission of the 80 dB noise standard regulation for heavy and medium trucks published in the March 19, 1981 Federal Register, we offer the following. Because the 76 dB noise regulation for truck-mounted solid waste compactors is contingent upon the 80 dB regulation for medium and heavy trucks, Dempster Systems, Inc. has a very strong interest in having both regulations rescinded.

We feel that the increased severity of the pending noise reduction regulations, to 80 dB for the medium and heavy trucks and 76 dB for the compactors, is unnecessarily inflationary and is not in the interest of the general welfare of this country. Particularly in the light of the current and probable near term economic condition of the industries involved, the issuance of these regulations would be counterproductive. The increased cost of materials, research and development, and inventories of obsoleted parts would by necessity be passed on to the final purchaser in the form of higher prices and cause him even greater burden due to the excessively high costs of money at the present time.

Additional research and development programs would be more expensive and the costs more difficult to recover through spreading across production units because of the extremely low volume of units being sold at this time. New parts and components developed to further reduce noise emissions will be more expensive than otherwise would be expected, due to the low volumes anticipated for the near future. Additional increases in the sales prices of these vehicles is just what this depressed industry does not need.

New and unproven components installed for the purpose of noise reduction may be found to have relatively short life spans, thus generating additional costs for the replacement parts - as well as labor required for the parts installation. Furthermore, additional inspection will be needed in order to assure that the unit is being properly maintained and that none of the noise reduction parts have deteriorated to the point of failing to perform as required. Increased down time of the vehicle as a whole will surely result from the addition of these components.

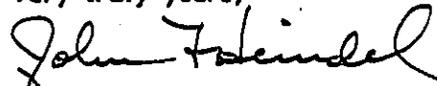
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We feel that, while the one-year deferral has provided temporary relief to the compactor industry through relaxing somewhat the urgency in research and the possibly hasty purchasing commitments concerning the new components, the regulation should be dropped entirely. We request that both the 80 dB regulation for the medium and heavy trucks and the 76 dB regulation for the truck-mounted solid waste compactors be rescinded permanently.

Very truly yours,



John F. Heindel, Manager  
Research & Development

JFH/mc

cc: Dr. Charles Johnson, Technical Director  
National Solid Wastes Management Association  
1120 Connecticut Avenue, NW - Suite 930  
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