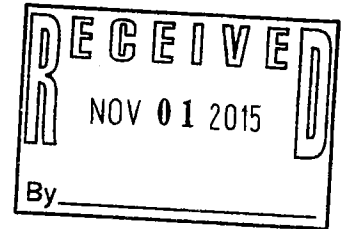


# BARON INDUSTRIES INC.



October 30, 2015

Attorney Beth D. McLaughlin  
General Counsel  
The Commonwealth of Massachusetts  
Department of Public Safety  
One Ashburton Place, Room 1301  
Boston, MA 02108

Dear Ms. McLaughlin:

Re: 524 CMR 32.00, et seq. changes

Hopefully you will recall our prior meetings concerning Vertical Reciprocating Conveyors (VRCs) and 524 CMR 32.00, et seq. It is my understanding that you have received an input from Tom Archie of Pflow concerning his proposed changes to that Regulation. Specifically, one of his concerns relate to the fact that, under the current definition of a VRC, units that have *scissor mechanisms* escape regulation as they do not have a "platform that moves in guides."

Whereas Tom is (rightfully) concerned that certain scissor lifts *can* be made to lift to a significant height, blanket coverage by 524 CMR 32 of all scissor lifts would sweep (however unintentionally) within its aegis commonplace loading dock equipment with limited travel height capability. I am sure that Tom overlooked this fact simply because Pflow, and the other true VRC manufacturers, do not offer such loading dock equipment. I have since brought this to his attention and discuss it below for DPS' and the BER's consideration.

Although Baron has been representing Pflow for 30+ years, we have for that period also sold, installed and serviced industrial loading dock equipment including, for example, "Dock Lifts." Dock Lifts are installed at the truck loading dock area in order to adjust for different vehicle height and floor level to effect safe loading and unloading.

Dock lifts are available either in "pit mounted" or "surface mounted" configuration. The problem here is that Dock Lifts utilize a scissor lift mechanism but they *do not exceed 60 inches in travel height*. I have taken the liberty of enclosing a sample "spec sheet" of both types as manufactured by The Kelly Co., whom we represent. You will note that these Dock Lifts have a "vertical travel" of 60" maximum!

Tom is rightfully concerned with other types of scissor lifts that are capable of high height travel that might be sold in lieu of a VRC to escape the aegis of 524 CMR 32 simply because their platforms do not "move in rails." See 524 CMR 32:02. Accordingly, it is my understanding that he has suggested the deletion of that "moves in rails" restriction in the definition of a VRC in the Regulation. Unfortunately, that simple change would sweep in Dock Lifts. A far better approach would be to leave the "moves in rails," but qualifies it with "and capable of vertical travel in excess of 60 inches."

To put the issue in perspective, there are thousands of such Dock Lifts in Massachusetts and having them (albeit unintentionally) swept within the aegis of 524 CMR, and the attendant permitting and annual inspections, would create havoc, unjustified excessive business costs and would be, in my opinion, a nightmare for DPS as well. Additionally, it would restrict the installation and service to only licensed elevator mechanics who have no knowledge or experience in this entirely different industry. Further, it would put untold numbers of "loading dock equipment" dealers out of business as they do not employ licensed elevator mechanics.

When I brought this to Tom's attention, he realized the problem and indicated to me that the VRC industry would agree that limiting the VRC definition in 524 CMR 32.02 in a way that encompasses only Scissor Lifts with a lifting height "in excess of 60 inches" addresses their concerns. You can certainly verify this with Tom as we both expect to be in attendance at next week's BER "listening session."

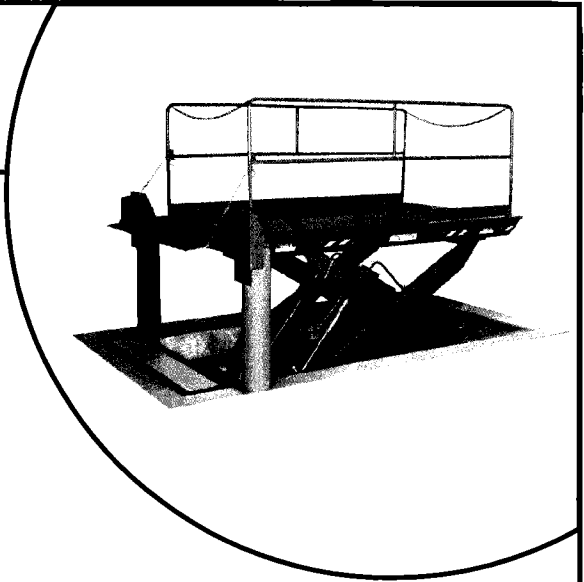
Baron fully supports 524 CMR, providing it does not encompass dock equipment for which, I believe, the Regulation was never intended. As always, we sincerely appreciate your time and attention to such issues.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Bruck", written in a cursive style.

Donald B. Bruck  
Chairman

**HULK® SERIES KDL DOCK LIFT - PIT MOUNTED**  
L I F T P R O D U C T S S P E C I F I C A T I O N S



**Design Highlights**

- High Tensile Strength, Structural Tubing Construction for Maximum Stability
- Dual Lifting Cylinders for Optimum Performance
- Velocity Fuses on Lift Cylinders Prevent Lift from Free Falling in the Event of Hydraulic Failure
- Pre-wired NEMA-4X Push Button Control Panel
- Versatile, Split Entry Plates with Lifting Chains
- Removable, Mandrel Formed Tubing Handrails
- Maintenance Strut
- Removable Lifting Lugs
- Meets ANSI MH29.1 Safety Requirements for Industrial Scissor Lifts
- Upper Travel Limit Switch
- Oil Sight Gauge in Hydraulic Reservoir
- Self-lubricating Bushings
- Standard 25' Hydraulic Hose
- Low Temperature Oil
- Two-year Parts, One-year Labor Limited Warranty
- UL Approved Panel

**Available Options**

- Electric Toe Guards
- Aluminum Bridge Plates
- Post Office Option Package
- Hot Dipped Galvanized
- Spring-assisted Bridge
- In-motion Warning Beeper and Flashing Light
- Roller Curtains
- Accordion Bellow Skirting
- Hydraulic Pop-up Stop
- Mechanical Pop-up Stop
- Hydraulic Lip
- Biodegradable Oil
- Special Sizes
- Other \_\_\_\_\_

**Project Information**

Job Name \_\_\_\_\_  
 Address \_\_\_\_\_  
 General Contractor \_\_\_\_\_  
 Distributor \_\_\_\_\_  
 Model \_\_\_\_\_ Quantity \_\_\_\_\_ Voltage/Phase \_\_\_\_\_

# HULK® SERIES KDL DOCK LIFT - PIT MOUNTED

## LIFT PRODUCTS SPECIFICATIONS



Model No.	Travel [in]	Capacity [lb]	Standard Platform [in]	Max. End Load [lb]	Max. Side Load [lb]	Lowered Height [in]	HP	Raise Lower Speed [fpm]	Ship Wt. [lb]
KDL48-4	60	4,000	48 x 96	3,000	2,000	12	5	16	2,450
KDL48-5	60	5,000	48 x 96	3,750	2,500	12	5	15	2,550
KDL48-6	60	6,000	48 x 96	4,500	3,000	12	5	15	2,575
KDL48-8	60	8,000	48 x 96	6,000	4,000	14	5	10	3,320
KDL58-4	60	4,000	60 x 96	3,000	2,000	12	5	16	2,400
KDL58-5	60	5,000	60 x 96	3,750	2,500	12	5	15	2,400
KDL58-6	60	6,000	60 x 96	4,500	3,000	12	5	15	2,450
KDL58-8	60	8,000	60 x 96	6,000	4,000	14	5	10	3,700
KDL68-5	60	5,000	72 x 96	3,750	2,500	12	3	12	2,850
KDL68-6	60	6,000	72 x 96	4,500	3,000	12	5	15	2,900
KDL68-8	60	8,000	72 x 96	6,000	4,000	14	5	10	3,350
KDL69-4	60	4,000	72 x 108	3,000	2,000	12	5	16	2,850
KDL69-5	60	5,000	72 x 108	3,750	2,500	12	3	12	2,950
KDL69-6	60	6,000	72 x 108	4,500	3,000	12	5	15	3,050
KDL69-8	60	8,000	72 x 108	6,000	4,000	14	5	10	4,000
KDL610-5	60	5,000	72 x 120	3,750	2,500	12	3	12	3,050
KDL610-6	60	6,000	72 x 120	4,500	3,000	12	5	15	3,150
KDL610-8	60	8,000	72 x 120	6,000	4,000	14	5	10	4,150
KDL78-4	60	4,000	84 x 96	3,000	2,000	12	5	16	2,710
KDL78-5	60	5,000	84 x 96	3,750	2,500	12	5	15	2,750
KDL78-6	60	6,000	84 x 96	4,500	3,000	12	5	15	2,825
KDL78-8	60	8,000	84 x 96	6,000	4,000	14	5	10	4,000
KDL79-5	60	5,000	84 x 108	3,750	2,500	12	5	15	2,860
KDL79-6	60	6,000	84 x 108	4,500	3,000	12	5	15	2,925
KDL79-8	60	8,000	84 x 108	6,000	4,000	14	5	10	4,200
KDL710-5	60	5,000	84 x 120	3,750	2,500	12	5	15	2,900
KDL710-6	60	6,000	84 x 120	4,500	3,000	12	5	15	2,900
KDL710-8	60	8,000	84 x 120	6,000	4,000	14	5	10	4,340
KDL88-5	60	5,000	96 x 96	3,750	2,500	12	3	12	2,850
KDL88-6	60	6,000	96 x 96	4,500	3,000	12	5	15	4,170
KDL88-8	60	8,000	96 x 96	6,000	4,000	14	5	10	3,400
KDL89-5	60	5,000	96 x 108	3,750	2,500	12	5	15	2,920
KDL89-6	60	6,000	96 x 108	4,500	3,000	12	5	15	3,000
KDL89-8	60	8,000	96 x 108	6,000	4,000	14	5	10	4,360
KDL810-5	60	5,000	96 x 120	3,750	2,500	12	3	12	3,150
KDL810-6	60	6,000	96 x 120	4,500	3,000	12	5	15	3,150
KDL810-8	60	8,000	96 x 120	6,000	4,000	14	5	10	4,540

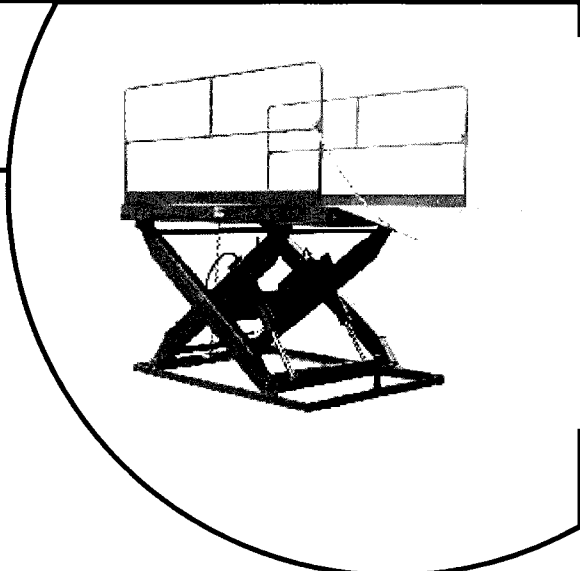
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NOTE

**HULK<sup>®</sup> SERIES KDL-SM DOCK LIFT - SURFACE MOUNTED**  
L I F T P R O D U C T S S P E C I F I C A T I O N S



**Design Highlights**

- High Tensile Strength, Structural Tubing Construction for Maximum Stability
- Velocity Fuses on Lift Cylinders Prevent Lift from Free Falling in the Event of Hydraulic Failure
- Pre-wired NEMA-4X Push Button Control Panel
- Versatile, Split Entry Plates with Lifting Chains and Entry Ramp
- Removable, Mandrel Formed Tubing Handrails
- Maintenance Strut
- Removable Lifting Lugs
- Meets ANSI MH29.1 Safety Requirements for Industrial Scissor Lifts
- Upper Travel Limit Switch
- Oil Sight Gauge in Hydraulic Reservoir
- Self-lubricating Bushings
- Standard 25' Hydraulic Hose
- Low Temperature Oil
- Two-year Parts, One-year Labor Limited Warranty
- UL Approved Panel



**Available Options**

- Portability
- Electric Toe Guards
- Aluminum Bridge Plates
- Post Office Option Package
- Hot Dipped Galvanized
- Spring-assisted Bridge
- In-motion Warning Beeper and Flashing Light
- Roller Curtains
- Accordion Bellow Skirting
- Mechanical Pop-up Stop
- Biodegradable Oil
- Special Sizes
- Other \_\_\_\_\_

**Project Information**

Job Name \_\_\_\_\_  
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Model \_\_\_\_\_ Quantity \_\_\_\_\_ Voltage/Phase \_\_\_\_\_

# HULK® SERIES KDL-SM DOCK LIFT - SURFACE MOUNTED

LIFT PRODUCTS SPECIFICATIONS



Model No.	Travel [in]	Capacity [lb]	Standard Platform [in]	Max. End Load [lb]	Max. Side Load [lb]	Lowered Height [in]	HP	Raise Lower Speed [fpm]	Ship Weight [lb]
KDL47-4SM	52	4,000	48 x 84	2,400	2,000	7	3	15	2,400
KDL47-5SM	52	5,000	48 x 84	3,000	2,500	7	3	10	2,550
KDL47-6SM	52	6,000	48 x 84	3,600	3,000	7	3	10	2,650
KDL57-4SM	52	4,000	60 x 84	2,400	2,000	7	3	15	2,500
KDL57-5SM	52	5,000	60 x 84	3,000	2,500	7	3	10	2,650
KDL57-6SM	52	6,000	60 x 84	3,600	3,000	7	3	10	2,750
KDL67-4SM	52	4,000	72 x 84	2,400	2,000	7	3	15	2,850
KDL68-5SM	52	5,000	72 x 96	2,500	2,500	7	3	9.5	2,850
KDL68-8SM	52	8,000	72 x 96	6,400	4,000	8	3	8	3,250

↑  
NOTE