

January 12, 2004



U.S. Department
of Transportation

400 Seventh Street, S.W.
Washington, D.C. 20590

**Research and
Special Programs
Administration**

DOT-E 4354
(FOURTEENTH REVISION)

EXPIRATION DATE: December 31, 2005

(FOR RENEWAL, SEE 49 CFR § 107.109)

1. GRANTEE: PPG Industries, Inc. (PPG)
Pittsburgh, PA
2. PURPOSE AND LIMITATION:
 - a. This exemption authorizes the transportation in commerce of methyl chloroformate in UN standard 1H1 drums and 6HA1 composite packagings which do not meet the test pressure specified in § 173.226(b) (1) or the overpack requirements of § 173.226(b). This exemption provides no relief from the Hazardous Materials Regulations (HMR) other than as specifically stated herein.
 - b. The safety analyses performed in development of this exemption only considered the hazards and risks associated with transportation in commerce.
3. REGULATORY SYSTEM AFFECTED: 49 CFR Parts 106, 107 and 171-180.
4. REGULATIONS FROM WHICH EXEMPTED: 49 CFR § 173.226(b) in that UN standard 1H1 drums and 6HA1 composite packagings with a test pressure of less than 550 kPa (80 psig) are not authorized and each drum or composite packaging must be overpacked except as provided herein.

5. BASIS: This exemption is based on the application of PPG dated November 18, 2003, submitted in accordance with §§ 107.109 and and 107.105 and the public proceeding thereon.
6. HAZARDOUS MATERIALS (49 CFR § 172.101):

Hazardous Materials Description			
Proper shipping name	Hazard Class/ Division	Identi- fication Number	Packing Group
Methyl chloroformate	6.1	UN1238	I, Hazard Zone A

7. SAFETY CONTROL MEASURES:

a. PACKAGING -

(1) Packagings prescribed are DOT Specification UN6HA1/X1.3/280 composite packagings and UN1H1/X1.3/280 drums. Vented closures are not authorized.

(2) Each drum or composite packaging used must:

(i) Be hydrostatically tested at a pressure of 280 kPa (40 psig).

(ii) Pass a leakage test at a pressure of at least twice the pressure of the lading at 55°C (131°F).

(iii) Have screw type closures that are-

(1) closed and tightened to a torque prescribed by the closure manufacturer, using a device capable of measuring torque;

(2) physically held in place by any means capable of preventing back-off or loosening of closure by impact or vibration during transportation; and

(3) provided with a cap seal that is properly applied in accordance with the cap seal manufacturer's recommendation and is capable of withstanding an internal pressure of at least 100 kPa (15 psig).

b. OPERATIONAL CONTROLS -

(1) Each drum or composite packaging authorized by this exemption must be transported in a 6.1 meter (20 ft.) steel freight container containing one or two layers of 36 drums or composite packagings. The freight container must be lined with 6.35 mm (0.25 inch) thick plywood on the sides of the container and 12.7 mm (0.5 inch) thick plywood on the ends, bottom and between layers of drums. Drums may be placed on plastic pallets prior to loading into the freight container. Use of pallets does not eliminate the requirement for plywood between the layers of drums.

(2) In addition, the freight container:

(i) must be loaded, blocked and braced in accordance with the drawing submitted October 25, 1994 or January 29, 2001 on file with the Office of Hazardous Materials Exemptions and Approvals (OHMEA). If a single layer of 36 drums or composite packagings is shipped, the freight container must be loaded, blocked and braced according to the January 29, 2001 drawing except that the rear bracing will extend to the height of the single layer of drums or composite packagings;

(ii) must be sealed by PPG after loading;

(iii) must be shipped from one origin to one destination without any intermediate pickup or delivery; and

(iv) may not contain any materials other than the material authorized by this exemption.

8. SPECIAL PROVISIONS:

a. A current copy of this exemption must be maintained at each facility where the package is offered for transportation.

- b. This exemption also constitutes an approval of the Competent Authority of the United States under Section 10.3 of the General Introduction to the International Maritime Dangerous Goods Code (IMDG Code).
9. MODES OF TRANSPORTATION AUTHORIZED: Motor vehicle, rail freight and cargo vessel.
10. MODAL REQUIREMENTS: A current copy of this exemption must be carried aboard each cargo vessel used to transport packages covered by this exemption.
11. COMPLIANCE: Failure by a person to comply with any of the following may result in suspension or revocation of this exemption and penalties prescribed by the Federal hazardous materials transportation law, 49 U.S.C. 5101 et seq:
- o All terms and conditions prescribed in this exemption and the Hazardous Materials Regulations, 49 CFR Parts 171-180.
 - o Registration required by § 107.601 et seq., when applicable.

Each "Hazmat employee", as defined in § 171.8, who performs a function subject to this exemption must receive training on the requirements and conditions of this exemption in addition to the training required by §§ 172.700 through 172.704.

No person may use or apply this exemption, including display of its number, when this exemption has expired or is otherwise no longer in effect.

12. REPORTING REQUIREMENTS: The carrier is required to report any incident involving loss of packaging contents or packaging failure to the Associate Administrator for Hazardous Materials Safety (AAHMS) as soon as practicable. (Sections 171.15 and 171.16 apply to any activity undertaken

under the authority of this exemption.) In addition, the holder(s) of this exemption must inform the AAHMS, in writing, of any incident involving the package and shipments made under the terms of this exemption.

Issued at Washington, D.C.:

A handwritten signature in blue ink that reads "R. Ryan Parker". The signature is stylized with a large, sweeping initial "R" and a long, horizontal stroke extending across the middle of the name.

for Robert A. McGuire
Associate Administrator for
Hazardous Materials Safety

Address all inquiries to: Associate Administrator for Hazardous
Materials Safety, Research and Special Programs Administration,
Department of Transportation, Washington, D.C. 20590.
Attention: DHM-31.

Copies of this exemption may be obtained by accessing the
Hazardous Materials Safety Homepage at
<http://hazmat.dot.gov/exemptions> Photo reproductions and legible
reductions of this exemption are permitted. Any alteration of
this exemption is prohibited.

PO: sdc