JUN 8 1998

U.S. Department of Transportation
Research and Special Programs Administration

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

DOT-E 10733
(FIRST REVISION)

EXPIRATION DATE: APRIL 30, 2000

(FOR RENEWAL, SEE 49 CFR 107.109)

1. GRANTEE: SUSPA, Inc.
Grand Rapids, MI

2. PURPOSE AND LIMITATIONS:

This exemption authorizes the manufacture, marking and sale of accumulators containing a limited quantity of compressed gases which deviate from the required test parameters. This exemption provides no relief from any regulation other than as specifically stated herein.

3. REGULATORY SYSTEM AFFECTED: 49 CFR Parts 106, 107 and 171-180.

4. REGULATIONS FROM WHICH EXEMPTED: 49 CFR 173.306(f)(2)(iii) and 173.306 (f)(3).

5. BASIS: This exemption is based on the application of SUSPA Incorporated dated January 8, 1998, submitted in accordance with 49 CFR 107.109 and a supplemental letter dated March 17, 1998.

6. HAZARDOUS MATERIALS (49 CFR 172.101):

Hazardous materials description -- proper shipping name	Hazard Class/ Division	Identi-fication Number	Packing Group
Accumulators, pressurized, pneumatic or hydraulic (containing non-flammable gas)	2.2	NA 1956	NA
Articles, pressurized, pneumatic or hydraulic (containing non-flammable, non-liquefied gas)	2.2	NA 3164	NA

7. PACKAGING(S) and SAFETY CONTROL MEASURES:

a. Packaging prescribed is a pneumatic accumulator constructed of DIN 239C drawn over mandrel precision steel tubing and other components which must comply with the specifications included in the application for exemption on file with the Office of Hazardous Materials Exemptions and Approvals. The accumulators have a capacity of not more than 5.5 cubic inches in volume. The maximum working pressure (with the piston fully depressed into the accumulator) is 3,300 psig. The maximum pressure during transportation is 1,951 psig. Accumulators must be designed and fabricated for a burst pressure of no less than 5 times the charged pressure at 70°F.

b. A lot is defined as the quantity of 1000 or less accumulators successively produced over a production shift not exceeding 10 hours, and having identical size, design, construction, material, heat treatment and quality. The following qualification tests must be performed:

(1) One accumulator from each lot must be burst tested and must burst at not less than five times its charged pressure at 70° F when shipped.

(2) Two completed accumulators, one from the beginning and one from the end of each lot must be pressure tested to at least 2.5 times the charged pressure without leakage or distortion.

c. If a lot fails to pass either of the above tests, an additional four sets of accumulators taken from that lot may be tested to qualify the lot. If any of the accumulators fail the qualification tests, that lot must be rejected.

8. SPECIAL PROVISIONS:

a. Offerors for transportation of the hazardous materials specified in this exemption may use the packaging described in this exemption for the transportation of such hazardous materials provided no modifications or changes are made to the packages, all terms of this exemption are complied with, and a copy of the current exemption is maintained at each facility from which such offering occurs.

b. Each packaging manufactured under the authority of this exemption must be either (1) marked with the name of the manufacturer and location (city and state) of the facility

at which it is manufactured or (2) marked with a registration symbol designated by the Office of Hazardous Materials Exemptions and Approvals for a specific manufacturing facility.

c. A copy of this exemption, in its current status, must be maintained at each manufacturing facility at which this packaging is manufactured and must be made available to a DOT representative upon request.

d. Shippers using the packaging covered by this exemption must comply with all provisions of this exemption, and all other applicable requirements contained in 49 CFR Parts 171-180.

e. MARKING -

(a) Each packaging manufactured under the authority of this exemption must be marked as follows:

(1) The outside of each packaging must be plainly and durably marked "DOT-E 10733".

(2) Each packaging must be marked either (1) with the name of the manufacturer and location (City and State) of the facility at which it is manufactured or (2) with the registration symbol designated for the specific manufacturing facility.

(b) Each package must be prepared and shipped in accordance with the following:

(1) The accumulators must be packed in a strong outside packaging as prescribed in 49 CFR 173.301(k).

(2) The outside of each outside package must be plainly and durably marked "INSIDE CONTAINERS COMPLY WITH DOT-E 10733".

9. MODES OF TRANSPORTATION AUTHORIZED: Motor vehicle, rail freight, cargo vessel, cargo aircraft only, and passenger aircraft.

10. MODAL REQUIREMENTS: A copy of this exemption must be carried aboard each cargo vessel or aircraft used to transport packages covered by this exemption. The shipper shall furnish a copy of this exemption to the air carrier before or at the time the shipment is tendered.

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. Section 5101 et seq:

- All terms and conditions prescribed in this exemption and the Hazardous Materials Regulations, Parts 171-180.
- Registration required by 49 CFR 107.601 et seq., when applicable.

Each "Hazmat employee", as defined in 49 CFR 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 49 CFR 172.700 through 172.704.

No person may use or apply this exemption, including display of its number, when the 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. (49 CFR 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 also inform the AAHMS, in writing, as soon as practicable of any incidents involving the package and shipments made under this exemption.

Issued at Washington, D.C. JUN 8 1998

Alan I. Roberts (DATE)
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.

The original of this exemption is on file at the above office. Photo reproductions and legible reductions of this exemption are permitted. Any alteration of this exemption is prohibited.

Dist: USCG, FAA, FHWA, FRA
PO: sdc

APPENDIX A

The following are hereby granted party status to this exemption based on their application(s) submitted in accordance with 49 CFR 107.107 or 107.109, as appropriate:

Company Name City/State	Application Date	Expiration Date	Issue Date
SUSPA Compart A.G. Germany (U.S. Agent: SUSPA Inc., Grand Rapids (MI)	1/8/98	3/30/2000	JUN 8 1998

for Alan I. Roberts
Associate Administrator for
Hazardous Materials Safety