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

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

DEC 21 2000

DOT-E 12602

EXPIRATION DATE: January 15, 2001

1. GRANTEE: Allied Universal Corporation
Miami, FL

2. PURPOSE AND LIMITATION:

a. This emergency exemption authorizes the one-time transportation in commerce of a DOT specification 106A500X tank car tank which contains Chlorine. The tank car has a leak at a valve and has been equipped with a Chlorine Institute Emergency "B" kit to prevent further leakage during transportation. 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 §§ 172.302(c), 179.300-12(b), 179.300-13(a) and 179.300-14.

5. BASIS: This emergency exemption is based on the application of Allied Universal Corporation dated December 18, 2000, submitted in accordance with § 107.117 and a determination that it is necessary in order to protect life and property.

6. HAZARDOUS MATERIALS (49 CFR § 172.101):

| Proper Shipping Name/ Hazardous Materials Description | Hazard Class/ Division | Identi-fication Number | Packing Group |
|---|---|---|---|
| Chlorine | 2.3 | UN1017 | n/a |

7. SAFETY CONTROL MEASURES:

a. PACKAGING - Packaging prescribed is a DOT specification 106A500 tank car tank which is equipped with a Chlorine Institute Emergency "B" kit because of a leak at the valve. The emergency kit must prevent leakage during transportation.

b. OPERATIONAL CONTROLS -

(1) The tank car tank will be transported from Pompano Beach, FL to the Allied Universal facility in Miami, FL.

(2) The tank car tank will be transported by Transportation Services Unlimited, which is a contract carrier. The vehicle must be accompanied by personnel trained in how to proceed in the event of an emergency.

8. SPECIAL PROVISIONS: A current copy of this exemption must be maintained at the facility where the package is offered for transportation.

9. MODES OF TRANSPORTATION AUTHORIZED: Motor vehicle.

10. MODAL REQUIREMENTS: A current copy of this exemption must be carried aboard the motor vehicle used to transport the package 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:

- All terms and conditions prescribed in this exemption and the Hazardous Materials Regulations, 49 CFR Parts 171-180.

- Registration required by § 107.601 et seq., when

- 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 in Washington, D.C.:

Suzanne Hedgepeth

Robert A. McGuire
Associate Administrator for
Hazardous Materials Safety

DEC 2 1 2000
(DATE)

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.

Copies of exemptions may be obtained from the AAHMS, U.S. Department of Transportation, 400 7th Street, S.W., Washington, DC 20590-0001, Attention: Records Center, 202-366-5046.

PO: AM

**ALLIED UNIVERSAL CORP.**, 8350 N.W. 93 Street, Miami, Florida 33166-2098
305-888-2823
Fax 305-885-4671

December 18, 2000

Exemptions Branch
Associate Administrator for Hazardous Materials Safety
U.S. Department of Transportation
400 Seventh Street, S.W.
Washington, D.C. 20590-0001
ATTN: Ann Mazzulo

VIA FASCIMILE: 202-366-3308

Re: EMERGENCY EXEMPTION

Dear Ms. Mazzulo:

Allied Universal Corp. does hereby make an emergency application for AN EXEMPTION TO TRANSPORT a TWO multi-unit tank car tanks, hereinafter referred to as a ton container (DOT Specification 106A500X), with a Chlorine Institute Emergency B Kit applied to one of the ton container valves. Allied is requesting the emergency exemption do to problems that developed at a customer location with the ton container valve. At this time, the ton valve has malfunctioned either do to customer (operator error) or equipment failure, the problem can not be determined until the ton container is returned to the Allied facility for inspection.

The one ton container contains Chlorine, 2.3, UN1017, Poison-Inhalation Hazard Zone B, RQ.

Incident 1
Location: Broward City Utilities, 2401 North Powerline Road, Pompano Beach, Florida

During the process of unloading the one ton container (serial number 3927), the customer noted the ton container valve would not seat properly. Per their U.S. EPA Risk Management Program, they immediately applied a Chlorine Institute Emergency B Kit to the valve. No chlorine was released; therefore, the ton container is full, two thousand pounds of chlorine.

Transport: Transportation Services Unlimited, a contractor, shall pick-up the one ton container and will transport it on a flatbed truck to the Allied Miami facility with the B Kit applied. Both Allied and Transportation Services Unlimited have current Hazardous Materials Registrations per the requirements of 49 CFR 107 Subpart G. Once the one ton container arrives at the Miami facility, it will be unloaded and the valve removed for inspection. Ton container will be transported as follows:

1. Powerline Road East to Interstate 95
2. Interstate 95 South to the Florida Turnpike South
3. Florida Turnpike South to Florida Highway 27 East
4. Florida Highway 27 East to South River Drive East
5. South Rive Drive East to Northwest 93rd Street

Incident 2
Location: City of LaGrange, Cameron Mill Road, LaGrange, Georgia

During the process of unloading the one ton container (serial number 2422), the customer noted the ton container valve was malfunctioning and causing a chlorine release. They immediately applied a Chlorine Institute Emergency B Kit to the valve. Minimum chlorine vapor was released; therefore, the ton container is full, two thousand pounds of chlorine.

Transport: Transportation Services Unlimited, a contractor, shall pick-up the one ton container and will transport it on a flatbed truck to the Allied Ranger, Georgia facility with the B Kit applied. Both Allied and Transportation Services Unlimited have current Hazardous Materials Registrations per the requirements of 49 CFR 107 Subpart G. Once the one ton container arrives at the Miami facility, it will be unloaded and the valve removed for inspection. Ton container will be transported as follows:

1. Cameron Mill Road to Country Club Road
2. Country Club Road to Greenville Street
3. Greenville Street to Lafayette Parkway
4. Lafayette Parkway to Interstate 85 North
5. Interstate 85 North to Interstate 75 North
6. Interstate 75 North to Georgia Highway 411 North
7. Highway 411 North to Horton/Possum Hollow Road, Ranger, Georgia

As previously stated, there is no chlorine leak, the Chlorine Institute Emergency B Kit has mitigated any problems. We just need to remove it from the customer's location so that the Chlorine can be safely removed from the ton container at the Allied respective facilities.

Allied understands that it takes time to process an exemption, but the customers has requested that we remove the tons as soon as possible. If you can expedite the process, it would be greatly appreciated.

**The approved exemption is to be faxed to 305-885-4671, attn: Bernie Thompson.** If you have any questions regarding the incidents, please call Mr. Bernie Thompson at 305-888-2623, extension 139 concerning the Miami, Florida incident and Mr. John Haflett at 706-334-7377 concerning the Ranger, Georgia incident. Please mail a hard copy of the exemption to me at 8350 NW 93rd Street, Miami, FL 33166.

Sincerely,

Robin J. Eddy
Safety and Regulatory Compliance Manager