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

JUL 17 2001

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

DOT-E 12754

EXPIRATION DATE: November 30, 2001

1. GRANTEE: J.J. Keller & Associates, Inc.
Neenah, WI

2. PURPOSE AND LIMITATION:

a. This emergency exemption authorizes the offering for transportation of a packaging, containing no hazardous material, but represented as containing a hazardous material, for purposes of conducting compliance testing of American Airlines' hazardous materials acceptance and handling procedures. 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 §§ 172.203(a), 172.301(c), 172.303(a) and 172.401(a)(1) and (2) in that a packaging represented as containing a hazardous material by shipping papers marking and labeling without actually containing a hazardous material is not authorized, except as specified herein.

5. BASIS: This emergency exemption is based on the application of J.J. Keller & Associates dated June 29, 2001, 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
Adhesives, *containing a flammable liquid*	3	UN1133	II
Consumer commodity	ORM-D	n/a	n/a
Sodium hydroxide solution	8	UN1824	II, III

7. SAFETY CONTROL MEASURES:

a. PACKAGING - The packaging consists of a plastic bottle or a fiberboard representation of a bottle, with a capacity of one gallon or less, over packed in a non-specification fiberboard box with cushioning materials. The bottle will be partially filled with sand, water, or may be empty but marked or labeled to indicate that the materials contained in the bottle are those materials listed in paragraph 6 above. Each outer package may or may not be completely marked to reflect a hazardous material shipment.

b. OPERATIONAL CONTROLS - No test packages will contain hazardous materials. All tests will be stopped immediately after acceptance by the carrier or in any case prior to loading aboard an aircraft.

8. SPECIAL PROVISIONS: A current copy of this exemption must be maintained at J.J. Keller & Associates, Inc., and be available to a DOT/FAA inspector upon request.

9. MODES OF TRANSPORTATION AUTHORIZED: Motor vehicle. Shipments by air will be stopped prior to loading on the aircraft (see paragraph 7b).

10. MODAL REQUIREMENTS: No additional requirements other than as required by the HMR.

Issued in Washington, D.C.:

JUL 17 2001
(DATE)

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.

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