



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

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

DEC 1 - 2000

Mr. Warren G. Purdy  
Senior Division Agronomist  
Western Farm Service  
509 West Weber Avenue, Suite 201  
Stockton, CA 95203

Reference No. 98-0365

Dear Mr. Purdy:

This is in response to your letters and telephone conversations with me and Ms. Eileen Edmonson of my staff concerning whether the shipment of a fertilizer, identified as "Ammonium nitrate, 5.1, UN 1942, PG III," "Potassium nitrate, 5.1, UN 1486, PG III," or "Sodium nitrate, 5.1, UN 1498, PG III," in a rear-end loaded freight container is authorized under 49 CFR 173.240. We apologize for the delay in response and any misunderstanding or inconvenience this may have caused.

Specifically, you asked whether your 24-foot, rear-end loaded freight container would satisfy the requirement of a sift-proof container. You state that dunnage is placed across the rear end of the freight container, forming a rear wall. The freight container is then lined on the bottom and all sides, up to a height of 7 feet, with 4-mil thick clear polyethylene. The fertilizer is loaded in loose bulk form, using a troughing conveyor, into the enclosed area. After loading is completed, you stated the plastic liner is secured over the top of the fertilizer, and additional dunnage and liner is secured over the upper portion of the rear wall to prevent the release of any contents. The package, weighing about 21.5 tons, is transported by vessel from California to Hawaii.

Based upon the information you provided, the answer is yes. Your packaging would satisfy the requirements of a sift-proof, non-DOT specification, closed bulk bin under § 173.240(c).

Sincerely,

Hattie L. Mitchell, Chief  
Regulatory Review and Reinvention  
Office of Hazardous Materials Standards

509 West Weber Avenue  
Suite 201  
Stockton, CA 95203  
(209) 547-2650  
Fax: (209) 464-4652



The Best People. The Best Products.  
The Best Service.

CALIFORNIA VALLEY DIVISION

FACSIMILE TRANSMISSION COVER SHEET

DATE: 10/23/00  
TO: Eileen Edmussen  
COMPANY: DOT/HAZMAT  
PHONE NUMBER: 202/366 4481 FAX NUMBER: 366 3012

FROM: W.G. "SKIP" PURDY III Division Agronomist

CALL: (209) 547-2635 IF ILLEGIBLE OR INCOMPLETE

PAGES: 3 (INCLUDING COVER SHEET)

MESSAGE: While my old shop teacher, Mr Hargraves,  
might give me a D on the drawings I hope  
they can get this off dead center. If there  
are any questions please call. Thanks for your  
efforts on this. W Skip



W.G. "SKIP" PURDY III  
Division Agronomist



WAPREN G. PURDY III  
Division Agronomist



W.G. "SKIP" PURDY III  
Division Agronomist

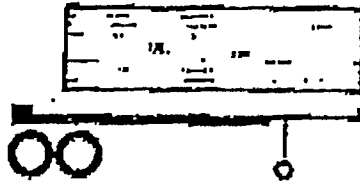
TransAgro Corporation  
10000  
W. G. "Skip" Purdy III  
Division Agronomist



# CONTAINER EQUIPMENT

## DRY CONTAINERS

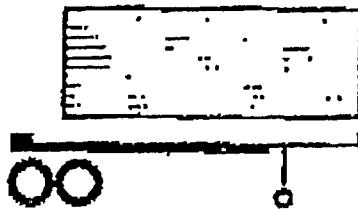
24' Dry Standard



Inside Length: 23' 6"  
 Inside Width: 7' 9"  
 Inside Height: 7' 10"  
 Door Opening: 7' 8" W x 7' 6" H  
 Empty Weight: 5930 lbs.  
 Cubic Capacity: 1422 ft.

Outside Length: 24'  
 Outside Width: 8'  
 Outside Height: 9' 6"

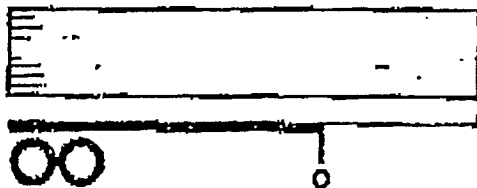
24' Dry High-Cube



Inside Length: 23' 6"  
 Inside Width: 7' 9"  
 Inside Height: 8' 10"  
 Door Opening: 7' 8" W x 8' 6" H  
 Empty Weight: 6750 lbs.  
 Cubic Capacity: 1598 ft.

Outside Length: 24'  
 Outside Width: 8'  
 Outside Height: 9' 6"

40' Dry Standard



Inside Length: 39' 6"  
 Inside Width: 7' 9"  
 Inside Height: 7' 10"  
 Door Opening: 7' 8" W x 7' 6" H  
 Empty Weight: 8490 lbs.  
 Cubic Capacity: 2387 ft.

Outside Length: 40'  
 Outside Width: 8'  
 Outside Height: 8' 6"

40' Dry High-Cube

Inside Length:

39' 6"

Outside Length:

40'

W.G. "Skip" Purdy  
Western Farm Service, CVD  
509 W. Weber Ave, Ste 201  
Stockton, CA 95203-3167

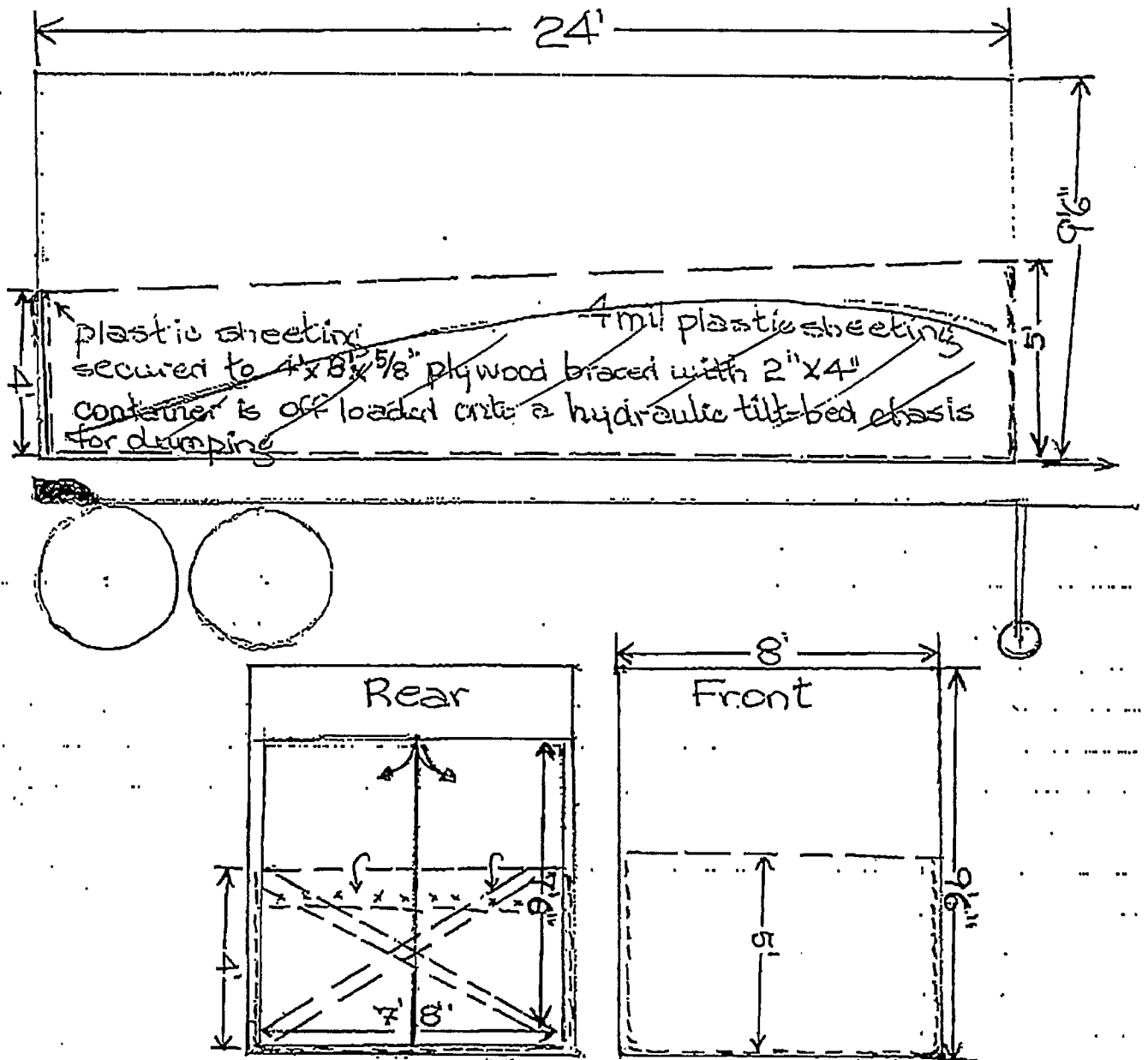
W.G. Purdy

10 23 00 1 1

Bulk oxidizer shipment in "sift proof container"

Verbal/HAZMAT

24' Dry standard container furnished by Matsun for Hawaiian service. Materials are fertilizers, potassium nitrate and sodium nitrate. Bulk densities average 74 lbs/cubic foot. Normal loading tends to place majority of cargo in the forward half to two thirds of the container. Containers are rated at 43,500 lbs net. Average cargo runs around 42,000 lbs per container.



plastic sheeting is placed on the interior on the bottom, sides and front then over the plywood sheeking used to cover the rear doors. Plastic is stapled to plywood lining the container.

## Edmonson, Eileen

---

**From:** Mitchell, Hattie  
**Sent:** Monday, October 16, 2000 7:57 AM  
**To:** Kirkpatrick, Ronald; Edmonson, Eileen  
**Cc:** Hochman, Charles  
**Subject:** RE: Interpretation for Western Farm Service

I overlooked your email earlier. The package is a closed-top freight container with rear, double doors that open from the center. A barrier wall is constructed with dunnage and lining, a few feet inward from the rear doors. The top portion remains open until the container is filled, then the upper portion is filled in with more dunnage and lining, forming a complete inner wall at the rear of the freight container.

-----Original Message-----

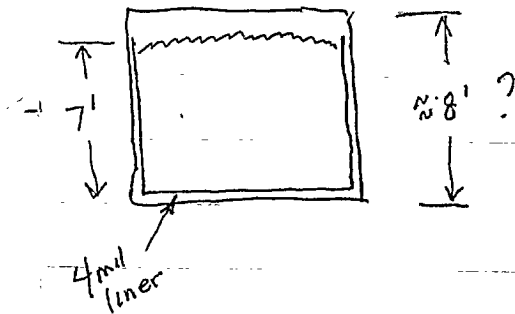
**From:** Kirkpatrick, Ronald  
**Sent:** Friday, October 13, 2000 1:47 PM  
**To:** Edmonson, Eileen  
**Cc:** Hochman, Charles; Mitchell, Hattie  
**Subject:** Interpretation for Western Farm Service

Having reviewed your response to Mr. Purdy, DHM-22 has no objection. Your efforts to extract more detail from Purdy evidently were only grudgingly addressed. In his Dec. 1, 1998 letter, Purdy writes:

"The fertilizer is then loaded in loose bulk form by troughing conveyor and securing sheeting over this." Your letter does not say the same thing. As I understand your language, the top of the load is not covered.

I've signed off on this, but I recommend you sort out the dilemma described above before proceeding further.

SEE e-mail 10/13



Purdy's 12/1/98 ltr. "... and securing sheeting over this."

Sounds like sheeting (somehow) is placed over the top of the material. BSPA response does not say this.

4:05 pm 10/16/00 "Slap" Purdy, Warren  
Damage only in back  
and some times lined w/ wood  
plastic pulled over top + taped  
or stapled

# Interpretation Letters

**Requester** Warren G. Purdy, III

**Date Received:** 12/8/98

**Company** Western Farm Service

**Tracking Number:** 98-0365

**Phone** 209-547-2650

**Revision Date:** 10/4/2000

**Date Assigned** 12/8/98

**Date of Letter** 12/1/98

**Staff** Edmonson

**First Draft Due:** 12/29/98

**Section** 173.240

**First Draft Date:** 5/5/2000

**Subject** Packaging General

**Concurrence**

**Status** CLOSED

**Status Date**

**Sign Date** 2/18/2000

**Signor**

HBP

Copy to Docket

Copy to DHM-60

**Comment**

re: is a freight cont. lined w/ 4ml poly. & filled w/ fertilizer & dunnage sift-proof?  
12/8/00 Lft. voice mail mess. rqst. picture or schematic of pkg. 3/3/00 Inc. to Mitchell  
for review. (Ltrs. gathered for branch project. Ltr. rtd. late 1999.) 2/17/00 Inc. to  
Mitchell for review. 2/18/00 HLMitchell - teleph, left mess. Use of polyetherlene  
sheeting may be used as a liner to make bulk container sift- proof. Sheeting must be  
properly secured to prevent any leakage. If no resp. w/in one week, ltr. will be  
closed. 5/1/00 Recv'd 4/24/00 ltr. from Mr. Purdy rqstng response. 5/2/00 Response  
drafted. Called Mr. Purdy w/ questions abt. material & container. 5/4/00 Spoke w/  
Mr. Purdy & recv'd addit. info. abt. pka. 5/5/00 Draft to Mitchell. 09/28/00 HLM spoke

# Interpretation Letters

**Requester** Warren G. Purdy, III  
**Company** Western Farm Service  
**Phone** 209-547-2650

**Date Received:** 12/8/98  
**Tracking Number:** 98-0365  
**Revision Date:** 5/5/2000

**Date Assigned** 12/8/98 **Date of Letter** 12/1/98

**Staff** Edmonson **First Draft Due:** 12/29/98

**Section** 173.240 **First Draft Date:** 5/5/2000

**Subject** Packaging General

**Concurrence**

**Status** CLOSED **Status Date**

**Sign Date** 2/18/2000 **Signor**

HBP  Copy to Docket  Copy to DHM-60

**Comment** re: is a freight cont. lined w/ 4ml poly. & filled w/ fertilizer & dunnage sift-proof?  
2/17/00 Inc. to Mitchell for review.

2/18 HLMitchell - teleph, left message. Use of polyetherlene sheeting may be used as a liner to make bulk container sift- proof. Sheeting must be properly secured to prevent any leakage.

5/1/00 Recv'd 4/24/00 ltr. from Mr. Purdy rqstng response. 5/2/00 Response drafted. Called Mr. Purdy w/ questions abt. material & container. 5/4/00 Spoke w/ Mr. Purdy & recv'd addit. info. abt. pkg. 5/5/00 Draft to Mitchell.

5/4/00 Spoke w/ Mr. Purdy: freight container  
- most dunnage is inside liner + is separately wrapped in the 4ml plastic; it's placed on both sides + ends for balance  
- separate piece of dunnage covers back door, its lined in the 4ml plastic too - this piece is outside  
- This is a regular rear-end freight container  
- Its end loaded with a conveyor belt deep into freight container. As container is filled the conveyor is backed out.  
- The load is either pure sodium nitrate potassium nitrate or ammonium nitrate. All meet the hazard class Division 5.1 for an oxidizer (one chemical per shipment)

G. Edmonson



# Interpretation Letters

Developed By Booz • Allen & Hamilton Inc.

**Requester** Warren G. Purdy, III.....  
**Company** Western Farm Service.....  
**Phone** 209-547-2650.....

**Date Received:** 12/8/98  
**Tracking Number:** 98-0365  
**Revision Date:** 2/18/2000

**Date Assigned** 12/8/98..... **Date of Letter** 12/1/98.....  
**Staff** Mack DHM 12 **First Draft Due:** 12/29/98  
**Section** 173.240 **First Draft Date:** .....

**Subject** Packaging General

**Concurrence** ..... **Days to Sign** 437.....

**Status** CLOSED **Status Date** .....

**Sign/Close Date** 2/18/2000 **Signor** .....

**Search:** Warren G. Purdy, III; Western Farm Service; Mack;

HBP  Copy to Docket  Copy to DHM-60

**Comment** 3/3/99 Inc. to Mitchell for review.....  
 2/18. HL Mitchell - teleph. left message.....  
 Use of polyetherlene sheeting may be used as a liner to make bulk container sift-proof. Sheeting must be properly secured to prevent any leakage.....  
 .....  
 .....  
 .....  
 .....  
 .....  
 .....

*file*

*sublim nit  
 potassium nitrate  
 fertilizer  
 300 oxidizer  
 called for required  
 letter on  
 "sift-proof"*

# Interpretation Letters

**Requester** Warren G. Purdy, III  
**Company** Western Farm Service  
**Phone** 209-547-2650

**Date Received:** 12/8/98  
**Tracking Number:** 98-0365  
**Revision Date:** 12/8/98

<b>Date Assigned</b>	12/8/98	<b>Date of Letter</b>	12/1/98
<b>Staff</b>	Mack	<b>First Draft Due:</b>	12/29/98
<b>Section</b>	173.240	<b>First Draft Date:</b>	
<b>Subject</b>	Packaging General		
<b>Concurrence</b>			
<b>Status</b>		<b>Status Date</b>	
<b>Sign Date</b>		<b>Signor</b>	
<b>HBP</b>	<input type="checkbox"/>	<b>Copy to Docket</b>	<input type="checkbox"/>
		<b>Copy to DHM-60</b>	<input type="checkbox"/>
<b>Comment</b>			

12/8 Called left voice mail. Need picture or schematic of design of plug to show to engineers. He won't be in till 12/11

2/18 called left message. Hammett  
If no response within a week, matter will be closed.

509 West Weber Avenue  
Suite 201  
Stockton, CA 95203  
(209) 547-2650  
Fax: (209) 464-4652



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April 24, 2000

United States Department of Transportation  
RSPA/Office of Hazardous Materials Standards  
400 7<sup>th</sup> Street S.W.  
Washington, D.C. 20590

Dear Sirs:

Your attention is directed to our inquiries of December 1, 1998, November 2, 1999 and various phone calls over the past five months in which we have been assured that a decision was "on the way."

Sincerely,

A handwritten signature in cursive script that reads "W. G. Purdy, III".

W. G. Purdy, III  
Senior Division Agronomist

dh

Encl.

509 West Weber Avenue  
Suite 201  
Stockton, CA 95203  
(209) 547-2650  
Fax: (209) 464-4652



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November 2, 1999

United States Department of Transportation  
RSPA/Office of Hazardous Materials Standards  
400 7<sup>th</sup> Street S.W.  
Washington, D.C. 20590

Dear Sirs:

Your attention is directed to our inquiry of December 1, 1998 (copy enclosed) and Matson's Freight Tariff 14-F. We and our Hawaiian customers would appreciate the resolution of this matter as our inability to deliver materials in bulk under the posted tariff is costing businesses in Hawaii \$48.00-50.00 a ton in additional expenses.

Thank you for your attention to this matter and we look forward to hearing from you in the near future.

Sincerely,

A handwritten signature in cursive script that reads "W. G. Purdy, III".

W. G. Purdy, III  
Senior Division Agronomist

dh

Encl.

509 West Weber Avenue  
Suite 201  
Stockton, CA 95203  
(209) 547-2650  
Fax: (209) 464-4652



*The Best People. The Best Products.  
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December 1, 1998

United States Dept. of Transportation  
RSPA/Office of Hazardous Materials Standards  
400 7<sup>th</sup> Street S.W.  
Washington, D.C. 20590

Dear Sirs:

In conversation with Lee Wilson of the HAZMAT office in Ontario, CA he suggested that I describe my problem to you and seek your guidance on the matter.

We have been shipping sodium nitrate and potassium nitrate to Hawaii in Matson Navigation Company's twenty-four foot containers for the past year. These fertilizers are, of course, oxidizing agents and are appropriately labeled and marked. We have been lining the containers with four mil clear polyethylene sheeting to a height of approximately seven feet, placing dunnage across the rear of the container and securing the sheeting over this. The fertilizer is then loaded in loose bulk form by troughing conveyor and securing sheeting over this. Average loaded weights are around 21.5 tons.

Our judgment was that this met the definition under 173.240 for a "sift proof" container. This has recently come under question and the Coast Guard has not wanted to pass judgment and suggested I ask HAZMAT, and hence, the request to you for clarification.

We've routinely handled these materials by rail and truck and received shipments in ocean going bulk carriers and simply wonder whether the thought of containerizing smaller bulk shipments on ocean going vessels simply hasn't been put down on paper.

Any suggestions or clarification would be greatly appreciated.

Sincerely,

A handwritten signature in cursive script that reads "Warren G. Purdy, III (by dh)".

Warren G. Purdy, III  
Division Agronomist

Encl: Matson Tariff 14-F

P.O. Lc Randall  
 MSO  
 USCG IJEL: 415-444-1381  
 0-444-1381

Mar 17, 97 11:20 No.002 P.02

**MATSON NAVIGATION COMPANY, INC.**

FREIGHT TARIFF 14-F, FMC-F NO. 31

ORIGINAL/REVISED	PAGE
22nd Revised	107

CANCELS	PAGE
21st Revised	107

FROM: PACIFIC COAST PORTS TO: HAWAII PORTS

EFFECTIVE DATE
February 3, 1997
CORRECTION NO.
2343

**SECTION 3 - COMMODITY RATES IN DOLLARS PER CONTAINER**  
 (Except as otherwise provided)

24D	24HD	40D	40F	40HD	40T	ITEM
24T						

FABRIC, rolled or flat wire reinforcing  
 FENCING, steel chain link in rolls or flat sections  
 FENCE POSTS, steel, including fittings

2293	2592	3831	3825	4356		1145 (N)
------	------	------	------	------	--	-------------

PUMPS, oscillating  
 (1) Rate applies only in 24D.

2213 (1)	2500	3745		4201		1147
-------------	------	------	--	------	--	------

FERTILIZER, viz: Kelp

2027	2027	2028		2028		1148
------	------	------	--	------	--	------

FERTILIZERS, in bulk in containers, viz.:  
 Ammonium nitrate or Ammonium phosphate  
 Calcium silicate, with or without iron  
 Nitrogen phosphate potassium  
 Potash, with or without magnesium  
 Potassium Nitrate & SODIUM NITRATE  
 Triple Superphosphate  
 Urea  
 Ammonium Sulfate

(2) (3) 1304						1149
(1) 1437						

- (1) Rate also applies on ammonium phosphate solution in shipper-furnished portable tank units loaded by shipper into 24-foot containers. Rate includes return of empty portable tank unit to origin CY.
- (2) Rate also applies on ammonium phosphate solution in shipper-furnished tank containers not exceeding 24 feet in external length.
- (3) Rate applies only in 24D.

DOLOMITE, calcined  
 FERTILIZER, NOS  
 GYPSUM, raw  
 PHOSPHATE ROCK, crushed, in bags  
 POTASSIUM NITRATE OR SODIUM NITRATE, in bags  
 WORM CASTING and LIQUID ORGANIC MATTER MIXTURES  
 ZINC SULFATE (fertilizer grade)

2027	2027	2256	3382	2256		1150
------	------	------	------	------	--	------

NOTE 1: Insecticides, Fungicides, Insect Repellents, Vermin Exterminators and Tree or Weed Killing Compounds, described in Item 232 may be loaded to a straight shipment moving under this item provided the weight thereof does not exceed ten percent of the total weight of the cargo in a container.

FILTERS, air

2466	2783	4170	4108	4679		1151 (N)
------	------	------	------	------	--	-------------

509 West Weber Avenue  
Suite 201  
Stockton, CA 95203  
(209) 547-2650  
Fax: (209) 464-4652



98-0365

*The Best People. The Best Products.  
The Best Service.*

December 1, 1998

maek  
§ 173.240

United States Dept. of Transportation  
RSPA/Office of Hazardous Materials Standards  
400 7<sup>th</sup> Street S.W.  
Washington, D.C. 20590

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We have been shipping sodium nitrate and potassium nitrate to Hawaii in Matson Navigation Company's twenty-four foot containers for the past year. These fertilizers are, of course, oxidizing agents and are appropriately labeled and marked. We have been lining the containers with four mil clear polyethylene sheeting to a height of approximately seven feet, placing dunnage across the rear of the container and securing the sheeting over this. The fertilizer is then loaded in loose bulk form by troughing conveyor and securing sheeting over this. Average loaded weights are around 21.5 tons.

Our judgment was that this met the definition under 173.240 for a "sift proof" container. This has recently come under question and the Coast Guard has not wanted to pass judgment and suggested I ask HAZMAT, and hence, the request to you for clarification.

We've routinely handled these materials by rail and truck and received shipments in ocean going bulk carriers and simply wonder whether the thought of containerizing smaller bulk shipments on ocean going vessels simply hasn't been put down on paper.

Any suggestions or clarification would be greatly appreciated.

Sincerely,

*Warren G. Purdy, III (by dch)*

Warren G. Purdy, III  
Division Agronomist

Encl: Matson Tariff 14-F

trailer

10-444-1381

P.O. Lt Randall

MSO

USCG Lt JEL: Dst

415-444-1381

Mar 17, 97 11:20 No.002 P.02

MATSON NAVIGATION COMPANY, INC.							ORIGINAL/REVISED	PAGE				
FREIGHT TARIFF 14-F, FMC-F NO. 34							22nd Revised	107				
							CANCELS	PAGE				
FROM: PACIFIC COAST PORTS TO: HAWAII PORTS							21st Revised	107				
							EFFECTIVE DATE		February 3, 1997			
							CORRECTION NO.	2343				
SECTION 3 - COMMODITY RATES IN DOLLARS PER CONTAINER (Except as otherwise provided)							24D 24F	25HD 40D	40F 40T	40HD 40T	ITEM	
FABRIC, rolled or flat wire reinforcing FENCING, steel chain link in rolls or flat sections FENCE POSTS, steel, including fittings							2295	2592	3001	3025	4356	1145 (N)
FANS, oscillating (1) Rate applies only in 24D.							2213 (1)	2500	3745		4201	1147
FERTILIZER, viz: Kelp							2027	2027	2020		2020	1148
FERTILIZERS, in bulk in containers, viz.: Ammonium nitrate or Ammonium phosphate Calcium silicate, with or without iron Nitrogen phosphate potassium Potash, with or without magnesium Potassium Nitrate & SODIUM NITRATE Triple Superphosphate Urea Ammonium Sulfate  (1) Rate also applies on ammonium phosphate solution in shipper-furnished portable tank units loaded by shipper into 24-foot containers. Rate includes return of empty portable tank unit to origin cy. (2) Rate also applies on ammonium phosphate solution in shipper-furnished tank containers not exceeding 24 feet in external length. (3) Rate applies only in 24D.							[2] [3] 1304  (1) 1497					1149
DOLOMITE, calcined FERTILIZER, NOS GYPSUM, raw PHOSPHATE ROCK, crushed, in bags POTASSIUM NITRATE OR SODIUM NITRATE, in bags WORM CASTING and LIQUID ORGANIC MATTER MIXTURES ZINC SULFATE (fertilizer grade)  NOTE 1: Insecticides, Fungicides, Insect Repellents, Vermin Exterminators and Tree or Weed Killing Compounds, described in Item 232 may be loaded to a straight shipment moving under this item provided the weight thereof does not exceed ten percent of the total weight of the cargo in a container.							2027	2027	2256	3302	2256	1150
FILTERS, air							2466	2703	4170	4108	4679	1151 (N)



## TELEPHONIC CONVERSATION RECORD

<i>Specialist Placing Call:</i> Eileen Edmonson	ROUTING	
<i>Date of Call:</i> May 4, 2000	SYMBOL	INT
<i>Person(s) Contacted:</i> Warren G. Purdy, III, Division Agronomist, Western Farm Service, 509 West Weber Avenue, Suite 201, Stockton, CA 95203, (209) 547-2650, (209) 464-4652		
<i>Regarding:</i> Can loose fertilizer be loaded in a polyethylene-lined freight container and meet the requirement of a sift-proof container under § 173.240?		
<i>Date of Incoming Letters:</i> December 1, 1998; November 2, 1999; and April 24, 2000.		
<i>Specific Subject (including section #'s and key words):</i> The Coast Guard has questioned whether or not their container meets the definition of a sift-proof container. Mr. Purdy would like the answer in writing.		
<p><i>Summary:</i> 12/8/98 I left a voice mail message for Mr. Purdy requesting a picture or schematic of the design of his package to show to the engineers. His message said he won't be in until 12/11/98. 3/3/99 Ms. Mitchell took the letter to review it. (Letters gathered for branch letter writing project. Letter returned to me in late 1999.) 2/17/00 Ms. Mitchell took the letter to review it. 2/18/00 Ms. Mitchell left Mr. Purdy a message that polyethylene sheeting may be used as a liner to make bulk containers sift-proof, but the sheeting must be properly secured to prevent any leakage. She stated in her notes if Mr. Purdy does not respond within one week the matter will be closed. 3/00 Mr. Purdy called Ms. Mitchell and requested a letter on "sift-proof." On 5/1/00, I received a letter from Mr. Purdy requesting a written response to his letters. On 5/2/00, I called Mr. Purdy with questions about the hazardous material and the container, and drafted a response. On 5/4/00, I spoke with Mr. Purdy and received additional information about the packaging. Mr. Purdy described his container as meeting the following conditions -</p> <ul style="list-style-type: none"> <li>• this is a regular rear-end freight container</li> <li>• the freight container is lined on the bottom &amp; sides with 4 ml plastic</li> <li>• dunnage, separately wrapped in 4 ml plastic, is placed on the inside of the liner in the front and sides of the freight container to help balance the container during loading and unloading</li> <li>• the container is then end loaded with loose fertilizer on a conveyor belt. Only one chemical is sent per shipment. The conveyor belt is placed deep within the freight container and after loading begins is backed out as the container is filled.</li> <li>• when the container is filled the plastic is sealed</li> <li>• a separate piece of dunnage, also wrapped in the 4 ml plastic, is then placed between the sealed fertilizer and the rear door. Then the rear door is closed.</li> </ul> <p>On 5/5/00, I redrafted the response saying the package met the definition of a sift-proof container and gave it to Ms. Mitchell for review. On 9/28/00, Ms. Mitchell spoke with Mr. Purdy and said he described the package differently. Ms. Mitchell returned the letter to me with edits.</p>		

*Comments for Further Action:* Review Ms. Mitchell's edits for any typographical errors. Forward the letter to Ms. Drakeford to prepare it in final form.

*Specialist Signature:*

*Eileen Edmonson*

*Date:* 10/4/00

WESTERN



FARM SERVICE

509 West Weber Ave., Suite 201  
Stockton, CA 95203

10

United States Department of Transportation  
RSPA/Office of Hazardous Materials Standards  
400 7th Street S.W.  
Washington, D.C. 20590

