



U.S. Department of Transportation
**Pipeline and Hazardous Materials
Safety Administration**

1200 New Jersey Ave, SE
Washington, D.C. 20590

APR 06 2011

Mr. Scott Meridith
Service Support Coordinator
ChemStation International
3400 Encrete Lane
Dayton, OH 45439

Reference No. 09-0211

Dear Mr. Meridith:

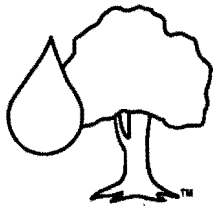
This is in response to your letter concerning Special Permit DOT-SP 12412 issued by the Pipeline and Hazardous Materials Safety Administration. This special permit authorizes its holder to discharge liquid hazardous materials from DOT Specification 57 portable tanks and certain UN standard intermediate bulk containers (IBCs) while the containers remain on the motor vehicle on which they were transported. You ask if two or more materials that may cause an unsafe condition when mixed may be loaded on the same transport vehicle if one material is in a UN 31H2 open-head plastic intermediate bulk container (IBC) and the other is in a UN 1H1 closed-head plastic drum. We apologize for the delay in responding and any inconvenience this may have caused.

Special Permit DOT-SP 12412 authorizes compatible liquid hazardous materials to be placed in and discharged from a UN 31A, 31B, 31N, 31H1, 31H2, or 31HZ1 IBC, or a DOT Specification 57 portable tank without removal from the transport motor vehicle, an operation not normally permitted under the HMR. See § 177.834(h). In accordance with paragraph 8.c of the special permit, "UN 1778, Fluorosilicic acid (i.e., fluosilicic acid), 8 (corrosive), PG II" and "UN 1791, Hypochlorite solutions, 8, PG II or III" contained in separate IBCs may be loaded on the same motor vehicle with two or more materials that could cause an unsafe condition when mixed provided that: (1) no more than two IBCs are transported on the same motor vehicle; (2) each IBC has a capacity that does not exceed 450 gallons; (3) the materials on the vehicle are not unloaded at the same time; and (4) the hazardous materials on the vehicle are used for water treatment only. Otherwise, paragraph 7.c.4 specifically prohibits packages authorized under the special permit from being loaded on the same motor vehicle with two or more materials that would cause an unsafe condition if mixed.

I hope this satisfies your request.

Sincerely,

T. Glenn Foster
Chief, Regulatory Review and Reinvention
Standards and Rulemaking Division



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Edmonson
§177.834(h)
Loading ~ Unloading
09-0211

To: Mr. Edward T Mazzullo
Director, Office of Hazardous Materials Standards
U.S. DOT/PHMSA
1200 New Jersey Avenue, SE Building, 2nd Floor
Washington, DC 20590

Re: DOT-SP 12412

Dear Mr. Mazzullo

Page three of DOT-SP 12412 states that two or more materials may not be loaded on the same vehicle if any mixture of the materials would cause an unsafe condition. My question is if it would be permissible to transport two such products on the same vehicle if one was in an UN 31H2 IBC and the other in a UN 1H1 drum. The drums would be palletized setting on the rear of the delivery truck and delivered to the customer prior to opening the IBC for pumping. At no point during the delivery process would a container be opened until the drums are delivered.

If you have any questions or concerns, please contact me at (800) 554-8265 ext.1148 or at smeridith@chemstation.com.

Sincerely,

Scott Meridith
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