NOV 15 1999

U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

DOT-E 12203

EXPIRATION DATE: OCTOBER 31, 2001

(FOR RENEWAL, SEE 49 CFR § 107.109)

1. GRANTEE: Celanese Ltd.
Bucks, Al

2. PURPOSE AND LIMITATION:

a. This exemption authorizes the use of video cameras and monitors to observe the loading or unloading operations of hazardous materials from a remote control station in place of personnel remaining within 7.62 meters (25 feet) of the cargo tank motor vehicles. This exemption provides no relief from any hazardous Materials Regulation (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 § 177.834(i)(3) in that a person does not have to be within 7.62 meters (25 feet) of the cargo tank during loading or unloading.

5. BASIS: This exemption is based on the application of Celanese Ltd. dated October 18, 1998, submitted in accordance with § 107.105 and the public proceeding thereon.

6. HAZARDOUS MATERIALS (49 CFR § 172.101):

Proper Shipping Name/ Hazardous Materials Description	Hazard Class/ Division	Identi-fication Number	Packing Group
Sulfur dioxide	2.3	UN1079	N/A Hazard Zone C

7. SAFETY CONTROL MEASURES:

a. PACKAGING - The hazardous material described in paragraph 6 must be transported in authorized DOT specification cargo tank motor vehicles.

b. OPERATIONAL CONTROLS -

(1) Each cargo tank must be loaded and unloaded by qualified persons, who are familiar with the product and with the proper procedures for its safe handling.

(2) The provisions of § 177.834(i) must be complied with except that paragraph (3) is replaced with the following:

A designated control room operator must observe all loading/unloading operations by means of video monitors located in the SO_2 Control Room. Each loading/unloading system must be equipped with the following:

(i) An SO_2 leak detection system as described in Celanese Operating Procedure 150-3104-072 and as shown on Celanese drawing number 150-3104-80-0215, Rev. 2, both of which are on file with the Office of Hazardous Materials Exemptions and Approvals (OHMEA). This system includes remote control video cameras and monitors, automatic shutoff valves, SO_2 gas detectors and storage tank level indicators.

(ii) Video cameras must have a motorized zoom lens, and must be capable of panning and zooming as directed from the remote control room. The cameras must be mounted above ground level and

situated so as to provide an unobstructed view of all equipment involved in loading/unloading operations on the top, side and underside of the cargo tank. This must include all valves, hoses, domes, and safety relief devices.

(iii) Upon loss of video, loading/unloading operations must be immediately terminated. Shutoff valves operable from the remote control room must be provided.

(iv) In the event of positive indication of SO_2 leakage by the gas detectors, the loading/ unloading operation must immediately terminated. This must be accomplished by both manual and automatic means.

8. SPECIAL PROVISIONS:

a. A current copy of this exemption must be conspicuously displayed in the remote control room at this facility.

b. The remote system operator must visually inspect each cargo tank motor vehicle after it is loaded, prior to departure, in accordance with facility policy.

c. Procedures for training of the remote system operators for their adherence to standard operating procedures, and for inspection and maintenance of video equipment, gas detection equipment, and of the shutoff valve/remote control system must be carried out as described in the application for this exemption, on file with the OHMEA. Celanese Ltd. must maintain a list of qualified operators. A copy of this list must be available for inspection during normal working hours.

d. This exemption applies only to the Celanese plant site at Bucks, Alabama.

9. MODES OF TRANSPORTATION AUTHORIZED: Motor vehicle.

10. MODAL REQUIREMENTS: None, other than as required by the HMR.

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 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.:

NOV 15 1999

Alan I. Roberts
Associate Administrator for
Hazardous Materials Safety

(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.

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