

Comment Info: =====

General Comment: June 27, 2007

Response to:

Occupational Safety and Health Administration/OSHA  
Docket No. OSHA-2007-0032

I am opposed to the above mentioned regulation change, unless it is modified to exempt black powder.

My understanding of the proposed changes is that it will exceed current DOT standards for flammable solids, namely black powder. As I interpret the changes, the ultimate effect will be the elimination of shipping of black powder by carriers such as UPS, FedEx, DHL, etc. (the primary carriers used for transporting black powder), because implementation and compliance will be too costly.

The result of this regulation will be to cripple the Black Powder Shooting Sports and have a severe, adverse effect on the economic impact of the sport.

The Black Powder Shooting Sports are one of the safest family sports in the country. Likewise, the transportation of black powder also has one of the best safety records in the shipping industry.

I am asking you to delay acceptance of the above mentioned standards until exceptions can be written into the regulations for black powder.

Sincerely,

Dennis A. Neely