

808 SW 15<sup>th</sup> Avenue, Portland Ore <sup>g</sup> 97205  
Phone 503-228-2644 X351 or 1-8 0-547-1400 X351  
Fax 503-412-3390  
e-mail DeniseCreighton@gwchem.com



72634

RSPA-00-6827-34

# Fax

To: **R. Ryan Posten** From: Denise **Creighton**

---

F a x : **(202) 366-3753** Pages: 3

---

**Phone: (202) 366-4535** **Date: 07/19/99**

---

**Re: Exemptions Questionnaire** cc: **Kim Henson**

---

**File Reference: 5.7 Exemptions DOT-E 11769**

Comments

Dear Mr. **Posten**:

I apologize for the delay returning this questionnaire to your office. I hope this information is helpful. If you have any questions, I can be contacted at **(503) 228-2644** ext. **351**.

Sincerely,

*Denise Creighton*

Denise **Creighton**  
Regulatory Documentation Coordinator

RECEIVED  
FEB 22 AM 9:51  
DEPT OF TRANSPORTATION  
OFFICE OF AIR QUALITY  
MANAGEMENT

Great Western Chemical

DOTE 11769

Questionnaire dated 5-27-99

1. What is the maximum number of **IBCs** that are transported on one vehicle at any one time?

8

2. Are **IBCs** mixed **with** other types of hazardous materials packages on the vehicle?

No

However, we are working on a new design that would have an approximately **10** foot dry van at the end of the truck bed (after the 8 totes). This would allow the delivery driver to drop off a non-bulk item to a customer while also delivering materials from the totes.

3. How are the **IBCs** secured to the motor vehicle? Provide drawings or **photographs**.

Steel clasps are built into the side of the trailer that work in conjunction with nylon webbing straps to secure each tote. The steel clasps have teeth that bite into the **webbing when as they are wenched into place.**

Please check our original application for detailed drawings.

4. Are the **IBCs** routinely removed from the motor vehicle? (What duration?)

Yes. When the vehicle is not in use, the **IBCs** are removed for **re-filling**, cleaning and re-testing when necessary.

5. What products do you ship and unload from the **IBC** under the terms of the exemption?

**Bisulfites**, aqueous solution, **nos (25-42%), 8, UN2693, III**

Hydrochloric acid, solution, **8, UN1789, II**

**Hypochlorite** solutions **(8-12.5%), 8, UN1791, III**

Nitric acid, **8, UN2031, II**

Phosphoric acid, **8, UN1805, III**

Potassium hydroxide, solution **(50%), 8, UN1814, II**

Sodium hydroxide, solution (S-SO%), **8, UN1824, II**

Sulfuric acid **(20-51%), 8, UN2796, II**

Sulfuric acid **(52-93%), 8, UN1830, II**

00 FEB 22 AM 9:51  
DEPT OF TRANSPORTATION  
FEDERAL BUREAU OF INVESTIGATION

6. What is the total quantity of **hazardous material** on one vehicle?

The maximum capacity is **2,640** gallons. (Eight **IBCs** that hold **330** gallons each)

Referencing question **#2**, the total quantity would increase to include any material **in the** van portion of the new design.

Great Western Chemical

DOTE 11769

Questionnaire dated 5-27-99

7. What is the maximum quantity of hazardous **material** delivered to a customer during one delivery?

The maximum capacity of **2,640** gallons.

8. Do deliveries contain materials that would create an unsafe condition, such as an explosion, fire, excessive increase in pressure or heat, or the release of toxic vapors, as a result of any mixture of the materials?

Our delivery drivers are well trained in proper handling, loading and unloading procedures using this delivery system which ensures that the chemicals do not **co-mingle**. However, if some of the materials did co-mingle it could cause an unsafe condition.

9. Are the **IBCs** unloaded under **pressure**? If so, what material is used to pressurize the **IBC**?

No

10. What is the maximum length of discharge hose, and how is the **hose** purged after delivery to the **customer**?

The maximum length of the hose is **100** feet (five hoses in **20** foot sections) and it is stored on a reel.

Hoses are purged two different ways.

1. If only one hazardous material is carried on the vehicle, the line is blown out with air and capped for the return trip for cleaning at the distribution facility.
2. If multiple hazardous materials are carried on the vehicle, the eighth **IBC** is empty for the driver to use to rinse the hose with water before unloading another material. This **IBC** is returned to the facility for disposal and cleaning.

11. How many discharge hoses are on one vehicle?

Average of five (each **20** feet long) that may or may not be connected together.

12. **How** many shipments are made per month under the terms of the exemption?

Approximately **12**.

13. How many **deliveries** are made during one shipment?

One to two deliveries.