

176076

DEPT. OF TRANSPORTATION
DOCKETS

02 JUN -6 PM 2: 13

12855
43727

June 3, 2002

Ryan Posten
Office of Exemptions
U.S. Department of Transportation
Washington, D.C.

[SPA-02-12454-1]

Dear Ryan,

Per our conversation of 5/30/02, I am requesting a 6-month renewal of Exemption DOT-E 12855. This is an emergency situation as described in my original exemption request of October 10, 2001. There are a few changes as noted below which I hope will not cause a delay.

- Please modify the wording in Items 2, 7.a. and 7.b. that currently restricts the number of exchangers we are permitted to ship under the exemption. The number of vessels we could ship at any one time may range from 1 – 4. For example, it is imperative that we ship three exchangers within the next 5 days. We may also be forced to re-send the exchangers for cleaning within the next 6 months.
- The wording in Items 2.a. and 7.b.(2) only allows a one-time shipment. This, too, would prevent us from re-sending the exchangers for cleaning. Will you modify the wording to remove this restriction?
- Please see Items 2.b. and 6. We previously shipped the material as a dried polymer cement, using the description "Flammable Solid, Organic, N.O.S.". This time the cement is in a semi-liquid state similar to syrup in consistency. The appropriate DOT shipping description should read:

"Flammable Liquids, N.O.S. (Cyclohexane, Styrene Monomer), 3, UN1993, PGII, RQ(Cyclohexane)"
- Please refer to Item 7.b.(2). We now have two authorized cleaning/decontamination facilities.
 - Phillips Services, 212 Commerce Rd., Freeport, TX 77541
 - W-Industries, 1150 Charles St., Houston, TX 77041

Note: Phillips Services is the primary cleaning facility, but there may be occasions when the exchangers must be shipped to W-Industries. Will you include both facilities in the exemption renewal?

- Please refer to Item 5. The company name should read KRATON® Polymers.

Please contact me @ (740) 423-2261 for questions or issues. Thank you again for helping our company complete this critical piece of business.



Bill Reinike
Distribution Representative
KRATON® Polymers U.S. LLC