



208415

RSPA-00-7209-86

12443A

**Transportation Regulatory Information & Management – NA HSE Services**

October 28, 2002

Mr. Robert McGuire  
Associate Administrator for Hazardous Materials Safety  
Research and Special Programs Administration  
U.S. Department of Transportation  
400 7th Street, SW  
Washington, DC 20590-0001

DEPT. OF TRANSPORTATION  
02 OCT 20 PM 2:08

Attention: Exemptions, DHM-31

**RE: Request for Renewal of Party Status to DOT Exemption No. E-12443**

Dear Mr. McGuire:

This is to request renewal of our party status to DOT Exemption 12443 in accordance with the 49CFR 107.109. This exemption allows tank cars to remain standing with unloading connections attached when no product is being transferred. The hazardous materials for which this exemption would apply are Sulfuric Acid, UN 1830; Sulfuric Acid, Spent, UN 1832; and Sulfuric Acid, fuming, with less than 30% free SO3, UN 1831.

The petitioner is :

**Rhodia Inc.**  
CN 7500  
259 Prospect Plains Road  
Cranbury, NJ 08512

Contact: Donna Edminster  
Phone: 609-860-4085  
Fax: 609-409-0176  
E-mail: [donna.edminster@us.rhodia.com](mailto:donna.edminster@us.rhodia.com)

Please note the change in address from our previous renewal application; the Raleigh NC office is being closed and the address is being switched to the Cranbury, NJ address shown above.

Rhodia has unloaded 2,850 tank cars under the terms of this exemption since our renewal of it at the end of January, 2002. Rhodia certifies that there have been no incidents involving the inadvertent release of any hazardous material during operations conducted under the terms of this exemption.

We believe this application is complete to the best of our ability and conforms to the requirements of 49 CFR §107.109. Please contact me should you require additional information.

Sincerely,

Donna Edminster  
Sr. Transportation Regulatory Specialist  
Rhodia Inc.