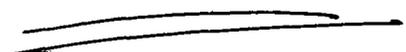


11470M

From: Special Permits <PHMSA>
Sent: Wednesday, March 11, 2009 11:04 AM
To: Nelson, Sherrie <PHMSA>
Subject: FW: Request for Modification DOT-SP 11470
fya

DEPT OF TRANSPORTATION
DOCKETS



PHMSA-2009-0102

From: Patricia Quinn [mailto:pquinn@pipeline.com]
Sent: Wednesday, March 11, 2009 10:55 AM
To: Special Permits <PHMSA>
Cc: LaValle, Diane <PHMSA>
Subject: Request for Modification DOT-SP 11470

Attached please find modification request for DOT-SP 11470 to add cargo vessel as additional mode of transportation. This request is filed on behalf of Procter & Gamble.

Mr. Delmer Billings
Director, Office of Hazardous Materials
Special Permits and Approvals
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Adm.
1200 New Jersey Avenue, SE
East Building, 2nd Floor, PHH-31
Washington, DC 20590

Dear Mr. Billings:

**REQUEST FOR MODIFICATION
DOT-SP 11470**

On behalf of **The Procter & Gamble Company**, this is to request a modification to DOT-SP 11470 to authorize cargo vessel as an additional mode of transportation under paragraph 9. This special permit authorizes shrink wrapped pallets containing boxes of Consumer Commodity waste materials with the word "WASTE" marked on the outside of the pallet instead of on each individual box. The mode of transportation currently authorized is by motor vehicle. The applicant wishes to add cargo vessel as an additional mode of transportation under DOT-SP11470.

1. **Applicant:** The Procter & Gamble Company, 8256 Union Center Blvd., West Chester, Ohio 45069, Contact Person: Steve Dishion, Telephone Number: (513) 634-9520. Please direct any questions concerning this application to Pat Quinn at 703-549-0727 or by-mail topquinn@pipeline.com.

2. **Hazardous Materials Authorized:**

Consumer commodity, ORM-D.

3. **Regulations from Which Exempted:**

49 CFR § 172.301(a)(2), in that relief from the marking requirements is not authorized, except as specified in the special permit.

4. **Modes of Transportation Authorized:** Motor vehicle. Request cargo vessel be added as additional mode of transportation.

Mr. Delmer Billings
March 11, 2009
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5. Request for modification:

The request for this modification to add cargo vessel to DOT-SP 11470 is based on the need of The Procter & Gamble Company to ship packagings containing Consumer Commodity waste products from Puerto Rico to the United States for proper disposal. Use of cargo vessels is essential in transporting these materials in a safe and timely manner.

6. Equivalent Level of Safety:

The Procter & Gamble Company believes that authorization to transport the Consumer Commodity waste materials, marked with the word "Waste" on each palletized load instead of each individual box, by cargo vessel, presents no greater hazard in transportation than similar waste products currently being transported by motor vehicle. The packages of expired consumer commodities must be shipped in their original undamaged packages. The outside of the shrink wrapped pallet must be marked with the DOT special permit number and the words, Waste, Consumer Commodity ORM-D.

Sincerely,



Patricia A. Quinn