



AREA CODE 708-572-7500

LIQUID CARBONIC

INDUSTRIES CORPORATION

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Federal Highway Administration
Office of the Chief Counsel
400 Seventh Street, SW
Room 4231 HCC-10
Washington, DC 20590

FHWA-97-2180-12

RE: FHWA DOCKET NO. **MC92-4**

Dear Sir:

We offer the following comments on MC 92-4 "Motor Carrier Safety Permits".

1. Motor Carrier Safety Permit. The Research and Special Programs Administration already requires a Certificate of Hazardous Material Registration. An additional permit or registration will not improve or increase the safe transportation of hazardous materials.
2. The issuing of a Safety Permit determined by a "Satisfactory" safety rating. We agree that only carriers with a "Satisfactory" safety rating should be permitted to transport hazardous material. This provision is already in place under existing regulations, duplication is not necessary.
3. Inspection of Vehicles before each trip. Part 392.7 of the regulations requires a driver to perform a pre-trip inspection each day and part 396.11 requires a driver to perform a post-trip inspection each day and prepare a written report. Our company drivers comply with these regulations are paid to perform the inspections; they are trained to do so. Requiring inspections by a "qualified inspector" prior to each trip would be an additional expense and paperwork burden, the inspections are already in place and do not need change.
4. Training and Routing. The provision to meet the training requirements of 177.825 for class 7 (radioactive) material is not necessary. **HM126F** already requires training for all employees who have any responsibility for the safe transportation of hazardous

material. Routing is already regulated under part 397.9 which does not require a written plan. The written plan requirement would create numerous problems and additional expense but would not improve the safe transportation of hazardous material.

This proposed regulation is not necessary, all of the requirements are already in effect under other existing regulations. The new regulations will create an additional paperwork and expense burden on motor carriers and will not increase the safe transportation of hazardous materials.

Thank you,

P. E. Leonard

P. E. Leonard,
Transportation Director
Liquid Carbonic Industries, Corp.