



Hackensack Water Company

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LEONARD S. ...

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August 6, 1993

FHWA Docket No. MC 92-4
Room 4232, HCC-10
Office of the Chief Counsel
Federal Highway Administration
400 Seventh Street SW
Washington, DC 20590

FHWA-97-2180-27

RE: Notice of Proposed Rulemaking, FHWA Docket No. MC-92-4

Dear Sir:

The Hackensack Water Company submits the following comments on the aforementioned docket.

Under Section I, "Purpose and **Scope**" (pages 33419-33420 of the June 17, 1993 Federal Register), the Federal Highway Administration (FHWA) requests information from transporters of Hazard Zone B hazardous materials and asks whether the safety permit program should be expanded to include these types of hazardous materials.

We transport chlorine, a Hazard Zone B hazardous material, in **non-bulk** quantities. The transportation of Hazard Zone B materials is an issue of concern and is regulated as such by the U.S. Department of Transportation. However, when the Research and Special Programs Administration (RSPA) designated various high risk transports to fund a national emergency response training program, the transport of Hazard Zone B materials were not included. The reason could be, as the FHWA states in its proposal, that most Hazard Zone B transports are in non-bulk quantities, which reduce the risk of large-scale emergencies.

Therefore, we agree that the FHWA, which is trying to maintain consistency with the registration requirements of the RSPA, should not include the transportation of Hazard Zone B hazardous materials in the safety permit program.

Thank you for allowing us to submit these comments. If you have any questions, please call me at (201) 767-2833.

Sincerely,

Donald L. Hoven
Director
Environmental Resources