

Monsanto

177708

The Agricultural Group
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Research and Special Programs Administration
U.S. Department of Transportation
Nassif Building - Room 8100
700 Seventh Street, S.W.
Washington, D.C. 20591-0001

Monsanto Company, St. Louis, MO is submitting this petition for rulemaking with regard to the definitions of bulk and non-bulk packaging for solids in 49 CFR 171.8.

A gap in the definitions exists for packaging with (a) a maximum net mass greater than 400 kg. having a maximum capacity of 119 gallons or less and (b) a maximum net mass of 400 kg. or less having a maximum capacity greater than 119 gallons.

It is recommended that the bulk definition for solids remain as currently written and that the non-bulk definition for solids be revised by replacing the word "and" with the word "or". If this is done, packaging for solids would be defined as bulk only if it has both a large net mass and a large capacity - otherwise it would be defined as non-bulk.

If you have any questions concerning this petition, please call me at (314) 694-2999.

Thank you for your consideration of this petition.

Sincerely,



William J. Briner
Regulatory Affairs Manager