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RSPPA-1993-12753-1



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February 3, 1993

Office of Hazardous Materials Regulation
U.S. Department of Transportation
400 Seventh Street, SW
Washington, DC 20590

Attention: Exemptions Branch

**SUBJECT: Request for Renewal - Exemption DOT-E 9781
Petition for Rulemaking
Chlorine Cylinder Recovery Vessel
(Salvage Cylinder)**

Exemption DOT-E 9781 was issued on November 9, 1987. The first revision was issued on August 2, 1989. The Chlorine Institute requests an extension of terms and conditions of this exemption due to expire on April 15, 1993. At the same time we respectfully petition the Department to consider amending Title 49 CFR so that the use of such equipment to mitigate a chlorine incident does not require the use of an exemption.

The description, technical information and safety assessment submitted by the Chlorine Institute on April 30, 1987 remain accurate and correct. Attached is a summary of known experiences with such salvage cylinders. It represents the experiences of participants in our CHLOREP program only. We are aware of two suppliers of recovery vessels built in accord with provisions of this exemption. In addition to members of the CHLOREP program, these salvage cylinders are in the hands of professional emergency responders.

If you have any questions relative to this request, please contact the writer at (202) 775-2790. We want to continue the use of this exemption with the special provisions in the first revision without any interruption due to expiration.

Very truly yours,

Michael E. Lyden
Vice President
Storage and Transport

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dotreg.ltr

Enclosure

ATTACHMENT

Quoted below is a summary of reported experiences with the DOT-E 9781 Salvage Cylinder provided by CHLOREP participants. Our March 1989 and March 1991 requests for extension provided other experiences.

1.

- a. **June 11, 1992** - A cylinder leak in the bottom of a 150-lb. cylinder was contained and returned from the customer's facility. The Emergency Kit A could not handle the leak. It was a reportable quantity. No injuries.
- b. **August 5, 1992** - A leak developed in the bottom of a cylinder in a distributor's warehouse. There was reduced exposure although it was a reportable quantity. No injuries.
- c. **October 15, 1992** - A cylinder developed a leak at the fuse plug thread. The recovery vessel was used to save time in shutting off the fuse plug. It took less than four minutes to correct the situation. The cylinder was returned to the absorption facility. It was not a reportable quantity. No injuries.
- d. **October 29, 1992** - A cylinder was leaking inside the footing area and odor was faintly detected by the customer. The cylinder was placed in the recovery vessel. Less than one pound was lost. No injuries.
- e. **December 18, 1992** - A customer broke the stem on the valve with a pipe wrench. Small leak through valve when recovering from connection. The cylinder was empty with residue. The recovery vessel was used to reduce exposure time it was not a reportable quantity. No injuries or required.

What we are experiencing is a trend of using the recovery vessel rather than the Emergency Kit A due to expediency.

2.

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|--------------------|---|--|
| June 3, 1991 | - | Fusible plug leak. |
| July 23, 1991 | - | Suspected leak around valve. Cylinder stored outside for three years. |
| August 23, 1991 | - | Cylinder bonnet fused to cylinder and chlorine leak detected. Bonnet contained brown liquid. Cylinder stored in outside area for over two years. |
| December 10, 1991 | - | Suspected leak around valve at cylinder body. |
| March 16, 1992 | - | Chlorine bonnet fused to cylinder and chlorine leak detected. Chlorine bonnet full of brown liquid. Cylinder stored outside for three years. |
| July 14, 1992 | - | Cylinder bonnet fused to cylinder and chlorine leak detected. Brown liquid in bonnet. |
| September 23, 1992 | - | Cylinder leak detected and could not be identified. |

3.

Our CHLOREP team (Harcros Jackson, MS) had its first use of the Chlorine Cylinder Recovery Vessel on May 12, 1992 and we found it to be quite effective. (See attached Accident Report) Since this incident, we have used this recovery vessel on two other incidents:

- a. May 25, 1992 (Memorial Day) Milstone Elementary School, Milstone, MS.
Leaking fuse plug
- b. December 16, 1992 Masonite Corp., Laurel, MS.
Leaking corroded valve stem

On each of the above three calls when we found it necessary to use the "Recovery Vessel" we found it to be very effective, not only for quick retrieval but its all around security features for transporting.