



CHEMICAL MANUFACTURERS ASSOCIATION

DEPT. OF TRANSPORTATION
DOCKETS

99 APR 19 PM 4: 28

53939

April 19, 1999

ORIGINAL

Docket Clerk
U. S. Department of Transportation
Federal Highway Administration
Room PL 401
400 Seventh Street, SW
Washington, DC 20590-0001

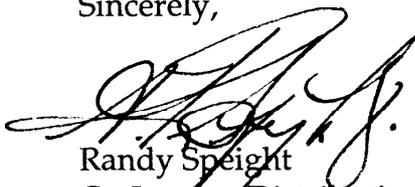
RE: Docket FHWA-99-3656 - 41
General Requirements Inspection, Repair, and Maintenance; Intermodal
Container Chassis and Trailers

Dear Sir or Madam:

Please find enclosed three copies of the written comments of the Chemical Manufacturers Association (CMA) regarding the Federal Highway Administration docket referenced above.

Thank you for the opportunity to comment upon the issues in Docket FHWA-99-3656. Please date-stamp one copy of the comments and return it to Meredith S. Grider, CMA, at the address listed below. If you need additional information or clarification, please contact Meredith at (703) 741-5256.

Sincerely,


Randy Speight
Co-Leader, Distribution Team


Joe J. Mayhew
Vice President, Regulatory Affairs

Enclosures

99 APR 19 PM 4:28

ORIGINAL

BEFORE THE
UNITED STATES DEPARTMENT OF TRANSPORTATION
FEDERAL HIGHWAY ADMINISTRATION

DOCKET FHWA-99-3656

GENERAL REQUIREMENTS INSPECTION, REPAIR, AND MAINTENANCE;
INTERMODAL CONTAINER CHASSIS AND TRAILERS

COMMENTS OF:

CHEMICAL MANUFACTURERS ASSOCIATION

MONDAY, APRIL 19, 1999

Joe J. Mayhew
Vice-President, Regulatory Affairs

G. Randy Speight
Co-Leader, Distribution Team

Meredith S. Grider
Distribution Team

Thomas E. Schick
Distribution Team

BEFORE THE
UNITED STATES DEPARTMENT OF TRANSPORTATION
FEDERAL HIGHWAY ADMINISTRATION

DOCKET No. FHWA-99-3656

GENERAL REQUIREMENTS INSPECTION, REPAIR, AND MAINTENANCE;
INTERMODAL CONTAINER CHASSIS AND TRAILERS

COMMENTS OF THE
CHEMICAL MANUFACTURERS ASSOCIATION
MONDAY, APRIL 19, 1999

The Chemical Manufacturers Association (**CMA**) is a nonprofit trade association whose member companies represent more than 90% of the productive capacity of basic industrial chemicals in the United States. CMA is pleased to have the opportunity to respond the Federal Highway Administration's (**FHWA**) request for comments concerning the advance notice of proposed rulemaking (**ANPRM**) regarding general requirements for inspection, repair, and maintenance of inter-modal container chassis and trailers.

CMA believes that, in this ANPRM, FHWA intends to address the custody transfer interface between the various inter-modal carriers but not the interface between carriers and chemical manufacturers who are shippers and receivers of this type of equipment. CMA member companies use inter-modal container chassis and trailers for the purposes of transporting raw materials or finished products. However, with the exception of private fleets, the carrier provides this equipment to them. Chemical manufacturers are typically not the owners of inter-modal equipment and do not tender or offer the equipment, but are the offerors of the hazardous material. Furthermore, chemical manufacturers do not have the facilities, equipment, or trained personnel to perform road worthiness safety inspections on containers and chassis. They depend on carriers to deliver a transport unit that is in compliance with the Federal Motor Carrier Safety Regulations (**FMCSR**) and is safe to load, unload, and maneuver on the plant site.

CMA requests that FHWA clarify that this ANPRM is not intended to impact chemical manufacturers. CMA appreciates the opportunity to seek this clarification.