

As a private citizen that has never submitted comments prior to this, please overlook any lack of proper format. This response is positive to your work ini CFR 49, blocking/bracing. I am disappointed that it does not go far enough for blocking/bracing and include protecting for drum like containers. Especially haz mat/dangerous goods. Having been employed in the transportation industry for forty years in various capacities, I know that without regulations the industry will not/ does not take the initiative. there would not be training as now required. There would not be salvage drums or containment kits on site or any other item that is done to stay in "compliance".That is why I applaud you for your work, but disappointed it does not encompass or recommend methods to reduce and/or eliminate forklift damage to drum type containers. From my years of employment in the industry with ltl common carriers,I have seen countless haz mat spills. I inquired to an emergency response employee from American Environmental, during a clean up, about cause and prevention. Juan, told me that 60% (sixty) percent of spills are caused by a forklift spear. This can be prevented, not by the present standard method of using 2 x 4's nailed around a drum or by dunnage of an old pallet put between the drum and other cargo. Need is the mother of invention, so I took this need and received patent no. 5,229,183 and trademark "DrumDefender". The device blocks,braces and protects fro fork lift spears. Even though I was able to sell a few, the response from a major common carrier was indicative of the mentality of the industry. "we will not jepordize short term profits for an eventuality that may never happen." The DrumDefender cost less than a salvage drum and is reusable. it is made from used tires and covered with Kevlar. It can be used in a warehouse to just protect or in a trailer to secure and protect. It is flexible to various size and type containers. If you would check with the RSPA dept. they will show how many incident reports received caused by forklift puncture. From my expeience and observation, I can estimate that only a fracton of the actual incidents are reported. I would be happy to share any of the testimonials by users of the drum defender on P&D and Linehaul units. The alternative is salvage drum and spill kits. that is who will lobby along with trucking interests to not include protection in your development of standards. Please review and tighten up the requiremnts and eliminate 60% of the hazardous material spills. Respectively, Gilbert R.Eastman