



CHEMICAL MANUFACTURERS ASSOCIATION

April 15, 1996

Dockets Unit (DHM-30)
Hazardous Materials Safety
Research and Special Programs Administration
U.S. Department of Transportation
Washington, DC 20590-0001

Re: Transportation of Hazardous Materials By Rail; Miscellaneous Amendments;
HM-216

Dear Sir or Madam:

The Chemical Manufacturers Association Vinyl Chloride Panel submits these comments for consideration in the above referenced docket. The Panel recognizes that these comments are submitted after the close of the comment period, but would like the opportunity to go on record in support of the proposed changes to Sections 172.330 (a) (1).

Specifically, the Panel maintains that the proposed changes to the tank car marking requirements in proposed Section 172.330 (a) (1) (ii) are appropriate to adequately inform transportation personnel and emergency responders about the tank car contents. By adjusting the marking requirements to allow the use of the "key words of the proper shipping name" or the proper shipping name or common name, the objective of the DOT's hazardous materials regulations will be attained, without compromising safety. This amendment will enable shippers whose proper shipping name is amended to avoid the unnecessary costs of remarking the tank cars provided the marking contains the key words of the proper shipping name.

The Panel appreciates the opportunity to submit these comments. Please call me at 703/741-5637 if you have any questions or need additional information.

Sincerely,

Hasmukh C. Shah, Ph.D.
Manager, Vinyl Chloride Panel

cc: Beth Romo
James H. Rader

CMA 111186