

April 8, 2015



U.S. Department
of Transportation

East Building, PHH-30
1200 New Jersey Avenue S.E.
Washington, D.C. 20590

**Pipeline and Hazardous
Materials Safety Administration**

DOT-SP 4354
(TWENTIETH REVISION)

EXPIRATION DATE: February 28, 2017

(FOR RENEWAL, SEE 49 CFR 107.109)

1. GRANTEE: ALTIVIA Specialty Chemicals, LLC
(Former Grantee: Axiall LLC
Houston, TX)
2. PURPOSE AND LIMITATION:
 - a. This special permit authorizes the transportation in commerce of methyl chloroformate in UN standard 1H1 drums and 6HA1 composite packagings which do not meet the overpack requirements of § 173.226(b). This special permit provides no relief from the Hazardous Materials Regulations (HMR) other than as specifically stated herein. The most recent revision supersedes all previous revisions.
 - b. The safety analyses performed in development of this special permit only considered the hazards and risks associated with transportation in commerce.
 - c. No party status will be granted to this special permit.
3. REGULATORY SYSTEM AFFECTED: 49 CFR Parts 106, 107 and 171-180.
4. REGULATIONS FROM WHICH EXEMPTED: 49 CFR § 173.226(b) in that each drum or composite packaging must be overpacked, except as provided herein.
5. BASIS: This special permit is based on the application of Axiall LLC, dated December 10, 2014, submitted in accordance with § 107.109, and additional information submitted by ALTIVIA Specialty Chemicals, LLC dated March 26, 2015.

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6. HAZARDOUS MATERIALS (49 CFR 172.101):

Hazardous Materials Description			
Proper shipping name	Hazard Class Division	Identification Number	Packing Group
Methyl chloroformate	6.1	UN1238	I, Hazard Zone A

7. SAFETY CONTROL MEASURES:a. PACKAGING -

(1) Packagings prescribed are as specified § 173.226 for the materials listed above. Vented closures are not authorized.

(2) Each drum or composite packaging used must:

(i) Be hydrostatically tested at a pressure of 280 kPa (40 psig).

(ii) Pass a leakage test at a pressure of at least twice the pressure of the lading at 55°C (131°F).

(iii) Have screw type closures that are-

(1) closed and tightened to a torque prescribed by the closure manufacturer, using a device capable of measuring torque;

(2) physically held in place by any means capable of preventing back-off or loosening of closure by impact or vibration during transportation; and

(3) provided with a cap seal that is properly applied in accordance with the cap seal manufacturer's recommendation and is capable of withstanding an internal pressure of at least 100 kPa (15 psig).

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b. OPERATIONAL CONTROLS -

(1) Each drum or composite packaging authorized by this special permit must be transported in a 6.1 meter (20 ft.) steel freight container containing one or two layers of 36 drums or composite packagings. The freight container must be lined with 6.35 mm (0.25 inch) thick plywood on the sides of the container and 12.7 mm (0.5 inch) thick plywood on the ends, bottom and between layers of drums. Drums may be placed on plastic or wooden pallets prior to loading into the freight container. If wooden pallets are used there must be a double wall corrugated slipsheet between the deckboards of the pallet and the bottom of the drums. Use of pallets does not eliminate the requirement for plywood between the layers of drums.

(2) In addition, the freight container:

(i) must be loaded, blocked and braced in accordance with the drawing submitted October 25, 1994 or January 29, 2001 on file with the Office of Hazardous Materials Special Permits and Approvals (OHMSPA). If a single layer of 36 drums or composite packagings is shipped, the freight container must be loaded, blocked and braced according to the January 29, 2001 drawing except that the rear bracing will extend to the height of the single layer of drums or composite packagings;

(ii) must be sealed by ALTIVIA Specialty Chemicals, LLC after loading;

(iii) must be shipped from one origin to one destination without any intermediate pickup or delivery; and

(iv) may not contain any materials other than the material authorized by this special permit.

8. SPECIAL PROVISIONS: A current copy of this special permit must be maintained at each facility where the package is offered for transportation.

9. MODES OF TRANSPORTATION AUTHORIZED: Motor vehicle, rail freight and cargo vessel.

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10. MODAL REQUIREMENTS: A current copy of this special permit must be carried aboard each cargo vessel used to transport packages covered by this special permit.
11. COMPLIANCE: Failure by a person to comply with any of the following may result in suspension or revocation of this special permit and penalties prescribed by the Federal hazardous materials transportation law, 49 U.S.C. 5101 et seq:
 - o All terms and conditions prescribed in this special permit and the Hazardous Materials Regulations, 49 CFR Parts 171-180.
 - o Persons operating under the terms of this special permit must comply with the security plan requirement in Subpart I of Part 172 of the HMR, when applicable.
 - o Registration required by § 107.601 et seq., when applicable.

Each "Hazmat employee", as defined in § 171.8, who performs a function subject to this special permit must receive training on the requirements and conditions of this special permit in addition to the training required by §§ 172.700 through 172.704.

No person may use or apply this special permit, including display of its number, when this special permit has expired or is otherwise no longer in effect.

Under Title VII of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) - 'The Hazardous Materials Safety and Security Reauthorization Act of 2005' (Pub. L. 109-59), 119 Stat. 1144 (August 10, 2005), amended the Federal hazardous materials transportation law by changing the term "exemption" to "special permit" and authorizes a special permit to be granted up to two years for new special permits and up to four years for renewals.

12. REPORTING REQUIREMENTS: Shipments or operations conducted under this special permit are subject to the Hazardous Materials Incident Reporting requirements specified in 49 CFR §§ 171.15 - Immediate notice of certain hazardous materials incidents, and 171.16 - Detailed hazardous

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materials incident reports. In addition, the grantee(s) of this special permit must notify the Associate Administrator for Hazardous Materials Safety, in writing, of any incident involving a package, shipment or operation conducted under terms of this special permit.

Issued in Washington, D.C.:



for Dr. Magdy El-Sibaie
Associate Administrator for Hazardous Materials Safety

Address all inquiries to: Associate Administrator for Hazardous Materials Safety, Pipeline and Hazardous Material Safety Administration, U.S. Department of Transportation, East Building PHH-30, 1200 New Jersey Avenue, Southeast, Washington, D.C. 20590.

Copies of this special permit may be obtained by accessing the Hazardous Materials Safety Homepage at http://hazmat.dot.gov/sp_app/special_permits/spec_perm_index.htm Photo reproductions and legible reductions of this special permit are permitted. Any alteration of this special permit is prohibited.

PO: ae