FEB 15 2000

U.S. Department of Transportation
Research and Special Programs Administration

400 Seventh Street, S.W.
Washington, D.C. 20590

DOT-E 12380

EXPIRATION DATE: **January 31, 2002**

(FOR RENEWAL, SEE 49 CFR § 107.109)

1. GRANTEE: Sullivan and Guldin, Inc.
   Athens, Ohio

2. PURPOSE AND LIMITATION:

   a. This exemption authorizes the transportation in commerce of fire-starting articles containing strike anywhere matches as Division 4.1, Flammable solids organic, n.o.s. classed, PG III when packaged as specified herein. In limited quantities, these articles may also be re-classed as Consumer Commodity, ORM-D. This exemption provides no relief from the Hazardous Materials Regulations (HMR) other than as specifically stated herein.

   b. The safety analyses performed in development of this exemption only considered the hazards and risks associated with transportation in commerce. The safety analyses did not consider the hazards and risks associated with consumer use or other uses not associated with transportation in commerce.

3. REGULATORY SYSTEM AFFECTED: 49 CFR Parts 106, 107 and 171-180.

4. REGULATIONS FROM WHICH EXEMPTED: 49 CFR § 172.101 Table in that Matches, strike anywhere, 4.1, UN1331, PG III is reclassed as Flammable solids, organic, n.o.s., 4.1, UN1325, PG III; § 173.213 in that the packaging described in this exemption is authorized.

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5. BASIS: This exemption is based on the application of Sullivan and Guldin, Inc. dated November 2, 1999, submitted in accordance with § 107.105 and the public proceeding thereon.

6. HAZARDOUS MATERIALS (49 CFR § 172.101):

Proper Shipping Name/ Hazardous Materials Description	Hazard Class/ Division	Identi-fication Number	Packing Group
Flammable solids organic, n.o.s. (fire-starting articles containing strike anywhere matches); or	4.1	UN1325	III
Consumer Commodity *	ORM-D	--	--

* The material may be reclassed as a consumer commodity provided it conforms to the limited quantity requirements of § 173.151.

7. SAFETY CONTROL MEASURES:

a. PACKAGING -

Inner Packaging: Rolls, wax-impregnated cotton, approximately 45 inches long and 3 inches wide, each containing not more than 22 wax coated strike anywhere matches spaced evenly apart in alternately opposing directions inside each roll.

Intermediate Packaging: Bags, plastic, each containing one inner packaging.

Outer Packaging: Non-specification fiberboard boxes, not less than 200 lb test strength, each containing not more than twenty-four intermediate packagings.

8. SPECIAL PROVISIONS:

a. A person who is not a holder of this exemption who receives a package covered by this exemption may reoffer it for transportation provided no modifications or changes are made to the package and it is reoffered for transportation in conformance with this exemption and the HMR.

b. A current copy of this exemption must be maintained at each facility where the package is offered or reoffered for transportation.

c. Each outer package, including those reclassed as a consumer commodity, must be plainly and durably marked "DOT-E 12380".

9. MODES OF TRANSPORTATION AUTHORIZED: Motor vehicle only.

10. MODAL REQUIREMENTS: None, other then as required by the HMR.

11. COMPLIANCE: Failure by a person to comply with any of the following may result in suspension or revocation of this exemption and penalties prescribed by the Federal hazardous materials transportation law, 49 U.S.C. 5101 et seq:

- All terms and conditions prescribed in this exemption and the Hazardous Materials Regulations, 49 CFR Parts 171-180.
- Registration required by § 107.601 et seq., when applicable.

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

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

12. REPORTING REQUIREMENTS: The carrier is required to report any incident involving loss of packaging contents or packaging failure to the Associate Administrator for Hazardous Materials Safety (AAHMS) as soon as practicable. (Sections 171.15 and 171.16 apply to any activity undertaken under the authority of this exemption.) In addition, the

holder(s) of this exemption must inform the AAHMS, in writing, of any incident involving the package and shipments made under the terms of this exemption.

Issued in Washington, D.C.:

FEB 15 2000
(DATE)

Robert A. McGuire
Acting Associate Administrator
for Hazardous Materials Safety

Address all inquiries to: Associate Administrator for Hazardous Materials Safety, Research and Special Programs Administration, Department of Transportation, Washington, D.C. 20590. Attention: DHM-31.

The original of this exemption is on file at the above office. Photo reproductions and legible reductions of this exemption are permitted. Any alteration of this exemption is prohibited.

Copies of exemptions may be obtained from the AAHMS, U.S. Department of Transportation, 400 7th Street, S.W., Washington, DC 20590-0001, Attention: Records Center, 202-366-5046.

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PO: SCW