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**CENTRAL TRANSPORT COMPANY**



**Main Office: Norfolk, Nebraska**

**TRANSPORTERS OF LIQUID AND BULK COMMODITIES**

March 31, 1993

537

Dockets Unit  
Research and Special Programs Adm.  
Department of Transportation  
400 Seventh Street, SW, Room 8421  
Washington, D.C. 20590-0001

Re: Animal and Vegetable Oil  
Exclusion from Docket HM#-217

11:00

Dear Sirs:

As a motor carrier transporting edible animal and vegetable oils I ask that you reconsider your "Interim Final Rule" in reference to 49 CFR Parts 171, 172, 173, 174 and 176 with the Research and Special Programs Administration. These rules clearly suggest that the transportation of edible oils would be regulated as hazardous materials. This type of rule making would greatly impede the transportation of animal and vegetable oils increasing more paperwork, possibly restrict the use of the equipment now presently servicing these giant industries.

The purpose of this rule makes sense for those of us now hauling hazardous materials, however, unfairly suddenly the term "oils" which includes all types of oils, is regulated by the hazardous materials regulations. Animal fats and vegetable oils degrade in the environment relatively easily, particularly when compared to the "oils" of mineral origin. The products we presently haul cause no more harm to the environment than a load of molasses, vinegar, cream or milk, corn syrup or chocolate.

A "hazardous" classification for these type of products would really confuse other governmental agencies., The USDA for example are encouraging the use of soybean oil and corn syrup for fuel alternatives. Inspectors would question placards placed on trailers for the sole purpose of loading "oils". Edible juices, wines or dairy product may be subject to personal interpretation of the "hazardous\*\*" connotation and not reload with same equipment. No shipper, from a liability standpoint, will jeopardize the integrity of their product because of this new label you are implementing.

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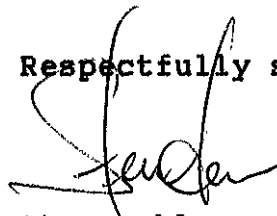
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The overall effectiveness of the hazardous materials program will be down played if we continue with this process. Workers now are trained to recognize hazardous chemicals to effectively handle, train and supervise cleanups quickly. No one would be exposed to fumes or chemicals that will irritate or harm the general public with the animal or vegetable oils. Why then are we mandating that these products be subject to the same rules that acids or chemicals are subject too.

The food and feed industries have not been fully represented with regards to the hazardous regulation. It is to my surprise that the major shippers we provide transportation services were not aware of such a rule. Regretfully, such a rule should have some of the food giants represented prior to Interim Final Rule stage.

I really do believe it was not your intention to create such a burden on the food and feed industries. I hope you will give our industry and related industries the opportunity to rebuttal this decision before it is too late. Implementation of this rule the way it is written can only bring on higher cost, lower utilization of equipment and additional administrative nightmares for the animal fat and vegetable oil industries.

Respectfully submitted



Steve Abler  
Central Transport Co.

SA/jl