



July 19, 2010

Docket Management Facility (M-30)
U.S. Department of Transportation
West Building Ground Floor, Room W12-140
1200 New Jersey Avenue S.E.
Washington, DC 20590-0001

Subject: Notice of Proposed Rulemaking (NPRM) on Docket No. USCG-2009-0091, RIN 1625-AB47 entitled, "Bulk Solid Hazardous Materials: Harmonization with the International Maritime Solid Bulk Cargoes (IMSBC) Code," published in Federal Register Volume 75, Number 116, dated Thursday, June 17, 2010, pages 34573-34609

Ladies and Gentlemen:

The Sulphur Institute (TSI), having reviewed and discussed the subject Notice of Proposed Rulemaking (NPRM) with its North American member companies, offers the following comment for consideration. Please note that these comments focus specifically to proposed changes related to sulphur.

The Institute fully supports the U.S. Coast Guard's proposed changes to Title 46, U.S. Code of Federal Regulations, Parts 97 and 148, "Bulk Solid Hazardous Materials: Harmonization With the International Maritime Solid Bulk Cargoes (IMSBC) Code." These changes include amending regulations to maintain alignment with international changes adopted by the International Maritime Organization. With regard to the safe transportation of sulphur, TSI is consistent in its support of transportation regulations and reasonable requirements that are based on technical and factual information and improve public safety.

Thank you for this opportunity to provide comments on the subject Docket. Please contact me with any additional questions or comments.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Harold H. Weber".

Harold H. Weber
Staff Vice President, Industrial
Programs

cc: R. Bornhorst