



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

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Washington, D.C. 20590

Ms. Alicia M. Shaban
Regulatory Chemist
Environment, Health & Safety
Ondeo Nalco Company
Ondeo Nalco Center
Naperville, IL 60563-1198

Ref. No. 03-0191

Dear Ms. Shaban:

This responds to your letter regarding the determination of proper shipping names for corrosive liquid mixtures and solutions under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you are requesting whether it is more appropriate to use the acidic/basic and organic/inorganic corrosive liquid descriptions (Identification Numbers UN3264-UN3267) or the "Corrosive liquid, n.o.s." proper shipping name (UN1760) under various scenarios. I apologize for the delay in responding. Your scenarios are paraphrased and answered as follows:

Q1. A mixture or solution is neither significantly acidic or basic (pH 7). The hazardous constituent of the mixture or solution is a basic organic component. Should the proper shipping name be "Corrosive liquid, basic, organic, n.o.s." (UN3267) or the more generic "Corrosive liquids, n.o.s." (UN1760)?

A1. Assuming the pH neutral mixture or solution meets the definition of a regulated corrosive material, when determining whether a mixture or solution is acidic/basic or organic/inorganic, a shipper must make that determination based on the hazardous constituent(s) of the mixture or solution. The proper shipping name that most appropriately describes the constituent(s) must be used. The most appropriate description for the mixture or solution you describe would be "Corrosive liquid, basic, organic, n.o.s." (UN3267).



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Q2. A mixture or solution contains organic non-hazardous constituents and an inorganic hazardous component or, alternatively, inorganic non-hazardous constituents and an organic hazardous component. What criteria should be used to determine the proper shipping name under this scenario?

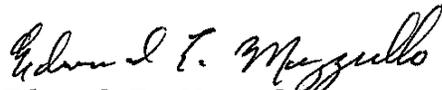
A2. Use of the terms "organic" or "inorganic" is based on the hazardous constituents in the mixture or solution, not the mixture or solution as a whole.

Q3. A mixture or solution contains inorganic non-hazardous constituents and the corrosive component is an amine. Should the proper shipping name be, "Amines, liquid, corrosive, n.o.s." (UN2735) or the more generic "Corrosive liquids, n.o.s." (UN1760)?

A3. The most appropriate description for the mixture or solution you describe would be "Amines, liquid, corrosive, n.o.s." (UN2735). In addition, the proper shipping name should be supplemented with the qualifying word "mixture" or "solution" as specified in § 172.101(c)(10).

I trust this satisfies your inquiry. Please contact us if we can be of further assistance.

Sincerely,



Edward T. Mazzullo
Director
Office of Hazardous Materials Standards



July 31, 2003

Mr. Edward T. Mazzullo
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 U.S. DOT/RSPA (DHM-10)
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Stevens
 §173.136
 Definition
 13-0191

Subject: Selection of UN ID number for corrosive liquids meeting definition in 49CFR173.136

Ondeo Nalco Company
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Dear Mr. Mazzullo:

Please confirm applicability of choosing various UN ID numbers for corrosive liquids. We cannot find any definitive explanation for use of the newer, more specific UN3264, 3265, 3266, and 3267, versus UN1760. These issues do not seem to be specifically defined in the D.O.T., IATA, IMDG, or ADR regulations.

First, we would like an opinion about using UN1760 specifically when pH is not either significantly acidic or basic, regardless of whether the technical component is an acid or base. For example, when the component of a mixture is a basic organic component, yet the pH of the product is neutral (approximately 7), would the component be used to determine the proper shipping name (UN 3267) or would the more generic UN1760 be used?

We would also like confirmation about which UN ID number to use when the corrosive components are inorganic but the mixture consists of both corrosive inorganics and non-hazardous organics, or corrosive organics and non-hazardous inorganics. Is the more specific shipping name preferred, based on the corrosive components, or should the shipping name reflect the nature of the whole mixture and not just the corrosive components? For example, if a mixture consists of corrosive inorganic components (i.e. phosphoric acid and sulfuric acid), yet the mixture also consists of non-regulated organic material, should the proper shipping name be based on the corrosive inorganic components (UN3260) or the mixture as a whole (UN1760)? (We note that there is a different emergency response guide (ERG) for UN3264/6 vs. UN3265/7.) Another example to consider: If the corrosive components are amines, is the more specific proper shipping name for UN2735 preferred, or if non-hazardous inorganic components are present, should the proper shipping name reflect the mixture as a whole (UN1760)?

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July 31, 2003

Thank you for your prompt response.

Yours Truly,

A handwritten signature in black ink that reads "Alicia M. Shaban".

Alicia M. Shaban
Regulatory Chemist
Environment, Health & Safety
630-305-2658

A handwritten signature in black ink that reads "Dana M. Hall".

Dana M. Hall
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