



U.S. Department  
of Transportation

**Research and  
Special Programs  
Administration**

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

JAN 11 2002

Mr. Chip Wildes  
Regulatory Affairs  
SAFT America, Inc.  
711 Industrial Blvd.  
Valdosta, GA 31601

Ref. No. 01-0306

Dear Mr. Wildes:

This is in response to your letter dated December 4, 2001. Specifically, you ask if the description "Batteries, wet, filled with alkali, electric storage, 8, UN 2795" is an authorized description under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180).

The answer is yes. A final rule under Docket HM-215D [66 FR 33316; 06/21/2001] revised the § 172.101 Hazardous Materials Table (§ 172.101 HMT). In this final rule, the description "Batteries, wet, filled with alkali, electric storage, 8, UN 2795" was inadvertently removed from the § 172.101 HMT. However, this final rule has a delayed compliance date of October 1, 2002. RSPA will correct this discrepancy in a future rulemaking.

I hope this satisfies your request.

Sincerely,

Delmer F. Billings  
Chief, Standards Development  
Office of Hazardous Materials Standards

172.101



BAT  
§ 172.101  
Proper Shipping  
Name  
01-0306

December 4, 2001

Attn: Diane  
Fax: 202-366-3012

From: Chip Wildes  
Fax: 229-247-6680

Subject: UN2795

Dear Diane:

Thank you for your help today concerning my call about the absence of UN2795 from Hazardous Materials Table. As we discussed, my company, Saft America Inc., manufactures Nickel-Cadmium batteries which are wet batteries filled with alkali. We are experiencing difficulties with shipping terminals turning back battery shipments because UN2795 is not listed in the Table. Today, we had a shipment turned back at a Roadway terminal after the terminal operator called the helpline and was told by the person who took the call that the UN2795 designation on our product was a bad designation.

Would you please send us a statement on DOT letterhead stating that UN2795 is a valid designation? We will then forward a copy of the letter to our carriers and perhaps send a copy with each shipment until the new table, which will include UN2795, comes out.

Thank you very much for your help with this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Chip Wildes'.

Chip Wildes  
Regulatory Affairs