



U.S. Department  
of Transportation

**Research and  
Special Programs  
Administration**

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

DEC 3 1998

Mr. Robert J. Kilian  
Larson Sales Company  
Park Ridge Office Center  
Building 1, Suite 230  
Pittsburgh, PA 15275

Ref. No. 98-0294

Dear Mr. Kilian:

This is in response to your letter dated September 16, 1998, regarding the applicability of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) to ferrosilicon with 75 percent silicon.

The HMR govern the transportation of hazardous materials in commerce. Under 49 CFR 173.22, it is the shipper's responsibility to properly classify a hazardous material. Such determinations are not required to be verified by this office.

Based on the test results you provided, it is our opinion that the ferrosilicon imported by your company does not meet the criteria of a Division 4.3 and provided it does not meet any other hazard class, it is not subject to the HMR.

I hope this satisfies your request.

Sincerely,



John A. Gale  
Transportation Regulations Specialist  
Office of Hazardous Materials Standards

172.101

# LARSON SALES COMPANY

Park Ridge Office Center • Building 1 • Suite 230 • Pittsburgh, PA 15275  
Phone 412-787-8611 • Fax 412-787-8627

BAH  
172.101  
(ferro)

98-0294

September 16, 1998

U.S. Department of Transportation  
Research and Special Programs Administration  
Office of Hazardous Materials Standards  
400 Seventh Street, S.W.  
Washington, D.C. 20590-0001

Attn: Mr. Delmer F. Billings

Dear Mr. Billings:

Larson Sales Company is an importer of 75% Ferrosilicon from South African producer Rand Carbide. We had Andrew S. McCreath & Son, Inc. test this material in accordance with DOT Standard 173, Appendix E, Division 4.3 (Dangerous when wet) and have found this material does not meet the criteria of Division 4.3 (Dangerous when wet) material. Test results are attached.

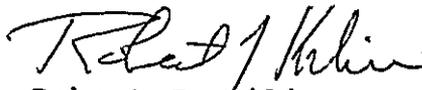
Please confirm subject material is not applicable under the hazardous materials regulation (HMR; 49 CFR Parts 171-180) for ferrosilicon between 30 and 90 percent silicon.

If you have any questions on the above, please call me at 412-787-4212.

Thank you for your assistance in this matter.

Sincerely,

LARSON SALES COMPANY

  
Robert J. Kilian  
Vice President

RJK/dmz

Attachment



# Andrew S. McCreath & Son, Inc.

ANALYTICAL AND CONSULTING CHEMISTS

610 Willow Street  
P.O. Box 1453  
Harrisburg, PA 17105-1453  
Telephone: (717) 238-9331  
Telex: 84-2321  
Fax: (717) 238-4843

September 8, 1998

To Whom It May Concern:

Hold #1 2nd Aft  
Ref. #3527-P

Gentlemen:

The sample of 75% Ferro Silicon 2" x 1/2", taken by us on August 25 - 27, 1998, ex: M/V "DARYA SHUBH" - 1,244.572 Metric Tons, which discharged at Reserve, Louisiana, was tested in accordance with DOT Standard 173, Appendix E, Division 4.3 (Dangerous when wet material). Results are as follows:

### Spontaneous Ignition Test

Division 4.3 a (1)  
Division 4.3 a (2)  
Division 4.3 a (3)

No Spontaneous Ignition  
No Spontaneous Ignition  
No Spontaneous Ignition

### Gas Evolution Measurement

Total volume in MI each hour.

<u>Time Interval</u>	<u>Test 1</u>	<u>Test 2</u>	<u>Test 3</u>
1 Hour	0.40 MI	0.30 MI	0.40 MI
2 Hour	0.50 MI	0.40 MI	0.40 MI
3 Hour	0.60 MI	0.40 MI	0.40 MI
4 Hour	0.60 MI	0.40 MI	0.40 MI
5 Hour	0.60 MI	0.40 MI	0.40 MI
6 Hour	0.60 MI	0.40 MI	0.40 MI
7 Hour	<u>0.60 MI</u>	<u>0.40 MI</u>	<u>0.40 MI</u>
Total	0.60 MI	0.40 MI	0.40 MI

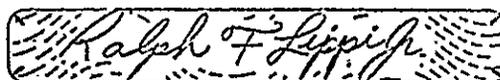
Page No. 2  
September 8, 1998  
DOT Test  
M/V "DARYA SHUBH"

Maximum Rate - 0.016 liter/hour/kilogram

Average Rate - 0.003 liter/hour/kilogram

Yours very truly,

ANDREW S. McCREATH & SON, INC.

A rectangular stamp containing a handwritten signature in cursive script that reads "Ralph F. Lippin". The signature is written in dark ink on a light background.