



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

JAN 13 1999

Ms. Jodi Smith
CYS Management Services, Inc.
P.O. Box 35386
Fort Wainwright, AK 99703

Ref. No. 98-0356

Dear Ms. Smith:

This is in response to your letter and subsequent telephone conversations with members of my staff. Your question concerns how to determine what constituents need to be identified when using a generic proper shipping name under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180).

Section 172.203(k) states that if a hazardous material is a mixture or solution of two or more hazardous materials, the technical names of at least two components most predominantly contributing to the hazards of the mixture must be entered on the shipping paper.

In your letter you indicated you had a mixture of waste antifreeze and water and that the antifreeze contains lead. This material is classified as a Class 9 material because it is a hazardous waste and meets no other hazard class. In this instance, the material is regulated as a hazardous waste for lead. Therefore, the technical name for your material would be either "lead" or "D008." The propylene glycol does not contribute to the Class 9 hazard so it does not need to be included in association with the shipping name.

I hope this satisfies your request.

Sincerely,

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

172-151

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BDH

§172.203

98-0336

Mr. Edward Mazzeillo
Director of Hazardous Materials Standards
USDOT / RSPA
400 7th Street S.W.
Washington, D.C. 20590-0001

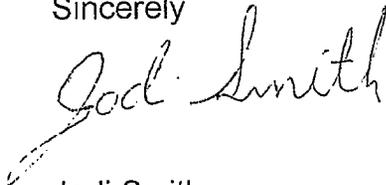
Subject: Proper Shipping Names

Dear Mr. Mazzeillo:

CYS Management runs a RCRA hazardous waste facility for the U.S. Army. We would like a letter of interpretation on the subject of what constitutes a hazardous material in reference to 172.203 k. Where it states " **if a hazardous material is a mixture of two or more hazardous materials , the technical names of at least two components most predominately contributing to the hazards of the mixture or solution must be entered on the shipping paper as required by paragraph K**" For example, if you have a mixture of antifreeze and water (55 gallons) and the antifreeze is contaminated with lead would you write the proper shipping name as Hazardous, Waste, Liquid, N.O.S. (Lead) or as Hazardous, Waste, Liquid, N.O.S. (Lead, Propylene Glycol)? When hazardous material is referred to in 172.203 K what makes it hazardous? does it have to be a listed or characteristic hazard or can it be anything hazardous like propylene glycol can be to animals?

Thank you for your time

Sincerely



Jodi Smith
Facility Manager