



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

JUN 11 1998

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

Mr. Fred V. Hayton
Westvaco -- Corporate Center
1011 Boulder Springs Drive
Richmond, VA 23225

Dear Mr. Hayton:

This is in response to your letter regarding the correct shipping description for loaded and empty tank cars containing "Black, Green, or White Liquor" under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). I apologize for the delay in responding and hope it has not caused any inconvenience. You provided the following examples:

Loaded Tank Car

Tank Car	RQ, Caustic Alkali Liquids, n.o.s. (Black/Green White Liquor), 8, UN 1719, PG II, (Black/Green/White) Liquor, contains) Emergency Response Guide Page: 154 Emergency Contact: Chemtrec 1-800-424-9300
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Empty Tank Car

Tank Car	Residue Last Contained: RQ, Caustic Alkali Liquids, n.o.s., (Black/Green/White Liquor), 8, UN1719, PG II (Black/Green/White) Liquor, contains) Emergency Response Guide Page: 154 Emergency Contact: Chemtrec 1-800-424-9300
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You stated that these materials are "corrosive," and that, depending on the material being shipped, you use only "Black, Green, or White Liquors" in your corrosive mixture(s). In a subsequent telephone conversation with a member of my staff, you stated that you did not know the constituents of the "Green or White Liquors" and that the "Black Liquor" contained "sodium hydroxide." You asked whether the descriptions in your examples are correct.

The letters "RQ" may not be shown in the examples for these corrosive mixtures, unless the materials meet the definition of a hazardous substance in 49 CFR 171.8, which specifies, in addition to other criteria, the material must be listed in the Hazardous Substance Table in § 172.101, Appendix A, Table I and meet or exceed the reportable quantity per package. "Black, Green, or White Liquor" are not specifically listed as hazardous substances. Sodium

hydroxide is listed in the Hazardous Substance Table with a RQ of 1,000 pounds. If your "Black Liquor" is shipped in a packaging and the amount of sodium hydroxide in it equals or exceeds 1,000 pounds, it meets the definition of a hazardous substance and the letters "RQ" must be shown either before or after the basic description. However, if your materials do not meet the definition of a hazardous substance, the letters "RQ" may not be included in the basic description.

For a mixture described by a generic or "n.o.s." proper shipping name listed in 49 CFR 172.203(k)(3), the technical name(s) of at least two components contributing predominately to the hazard of the mixture must be included in association with the basic description. If your products contain no more than one of the "Liquor" components, only the technical name of that component must be included as part of the basic description. In addition, if the proper shipping name for a material that is a hazardous substance does not identify the hazardous substance by name, the name of the hazardous substance must be entered in parentheses in association with the basic description. If the material contains at least two or more hazardous substances, the technical names of the two hazardous substances with the lowest RQ must be identified. The technical name(s) may be entered after the proper shipping name or after the basic description. If the technical name(s) of the hazardous materials and hazardous substances are the same, the technical name need only be entered once.

For your information, although not prohibited, the emergency response guide page number (e.g., guide page 154) is not required to be entered on a shipping paper.

I hope this information is helpful. If we can be of further assistance, please contact us.

Sincerely,



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

Westvaco

Engram
File: 172,200
SC 1747

March 13, 1997

Office of Hazardous Materials Standards
Department of Transportation
Research and Special Programs Administration, DHM31
DHM-10
400 7th Street, S.W.
Washington, DC 20590

Dear Sir or Madam,

Westvaco wishes to submit the following hazardous material shipping description for your review. If the description adheres to all Federal hazardous material shipping regulations and meets with your approval, please forward a written notification as such.

Loaded Tank Car

Tank Car RQ, Caustic Alkali Liquids, N.O.S., (Black/Green/White Liquor)
8, UN1719, PG II
(Black/Green/White Liquor, contains)
Emergency Response Guide Page: 154
Emergency Contact: Chemtrec 1-800-424-9300

Empty Tank Car

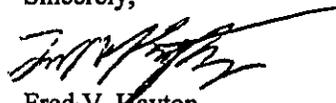
Tank Car Residue Last Contained:
RQ, Caustic Alkali Liquids, N.O.S., (Black/Green/White Liquor)
8, UN1719, PG II
(Black/Green/White Liquor, contains)
Emergency Response Guide Page: 154
Emergency Contact: Chemtrec 1-800-424-9300

Note: Use only Black, Green, or White Liquor, depending on material shipped.

The only components that should be listed after "contains" are those that contribute to the liquor's corrosiveness and meet the requirements listed in 172.101, Appendix A of the hazardous materials regulations.

If you have any questions or require additional information, please contact me at (804) 327-6403.

Sincerely,



Fred V. Hayton
Supervisor, Rail Operations