



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

APR 17 1998

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

Mr. Gary P. Velikanje
President
Wood Kote Products, Inc
8000 N.E. 14th Place
Portland, OR 97211

Dear Mr. Velikanje:

This is in response to your letter of October 16, 1997, regarding the packaging of a two component wood bleach kit consisting of an aqueous solution of hydrogen peroxide (28%) and an aqueous solution of sodium hydroxide with a buffer of silicic acid. You request clarification under the provisions of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180).

Specifically, you asked if a two part kit consisting of one inner container of a material described as Hydrogen peroxide, aqueous solution, 5.1, UN 2014 with a Class 8 subsidiary hazard, and one inner container of a material describe as Sodium hydroxide solution, 8, UN 1824, PG II may be placed in the same outside packaging for transport by vessel. You expressed concern that ocean carriers will not accept these shipments although they have been prepared in accordance with the HMR and the International Maritime Dangerous Goods (IMGD) Code.

Yes, these materials may be packaged together in the same outside package provided they are in accordance with 49 CFR 173.21 (e). As indicated in paragraph 3.6 in Annex I of the General Introduction to the IMDG Code, Amendment 28 (see IMDG Code page 0509), a corresponding provision specifies that materials may not be packaged together in the same outer packaging with other material if they react dangerously to each other and cause combustion and/or evolution of considerable heat, evolution of flammable, poisonous or asphyxiate gases, or the formation of corrosive or unstable substances.

In addition, it is the shippers responsibility to ensure that your materials are properly packaged, marked and labeled. Each material within the package, must be described on the shipping paper and marked on the outside package. The package must be labeled with a Division 5.1 label and a Class 8 label for the primary hazard of the materials.

I hope that this information is helpful. If you need further assistance, please contact us.

Sincerely,

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



*Polydore
File: 173.21
SC: 189*

16 October, 1997

Edward T Mazzullo, Director
Office of Hazardous Materials Standards
Research and Special Programs Administration
US DEPARTMENT OF TRANSPORTATION
400 7th St SW
Washington DC 20590

Via: Fax [202-366-8700] and USPS Priority Mail

Re: Request for clarification

Mr Mazzullo:

I am writing to request the assistance of your office. We manufacture and market a two component Wood Bleach kit. The components are: Part "A", an aqueous solution of Hydrogen Peroxide (28%) and Part "B", an aqueous solution of Sodium Hydroxide with a buffer of Silicic Acid. Each component is packaged in heavy duty polyethylene bottles (16 oz, 32 oz or 1 gal). The two bottles for the 16 oz and 32 oz kits are then enclosed in a plastic bag which is then placed into a light weight fiberboard box and then packed 6 kits in a UN specified heavy weight fiberboard carton. The gallon kits are packaged with 2 kits per UN specified heavy weight fiberboard carton with each Part "A" component enclosed in a plastic bag.

Should the two components leak and combine they will not react dangerously with each other, cause combustion or evolution of considerable heat, evolution of flammable or poisonous gases or vapors, or the formation of corrosive or unstable substances. The two components combined are, in fact, less dangerous than each individually.

I have, for your reference, enclosed the following MSDS's:

<u>Product Description</u>	<u>Product Code</u>
Part "A"	800-WB-A
Part "B"	800-WB-B
Part "A" & "B" combined ratio 1:1	800-WB-B

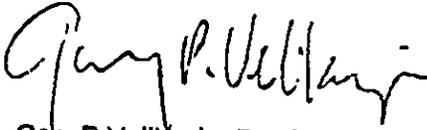
I am also enclosing photocopies of letters you have provided to the WM Barr Co. Our wood bleach is equivalent to the Klean-Strip Wood Bleach they produce except the "A" and "B" labeling is reversed. Our concern is the same as WM Barr's addressed in your 08 November 1995, letter. We want to be able to make domestic and international marine shipments of our wood bleach and would like to have clarification addressed to Wood Kote to present to the shipping authorities.

Would it be possible for you to provide a clarification letter addressed to Wood Kote which states that our Wood Bleach components are compatible for shipment together and therefore the segregation requirements enumerated in the IMDG Code page 0129 15.1.16 and 49CFR Sec 176.83(b) & (c) (2) (iii) do not apply?

I assume you may have questions and may require additional information before you can issue the documentation we are seeking. If so, please do not hesitate to contact us by telephone, 800-843-7666 or fax 503-285-8374.

I thank you, in advance, for your prompt attention to this matter.

Yours truly,



Gaty P Velikanje, President
WOOD KOTE PRODUCTS, INC

enclosures

cc: T Nash