



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

FEB - 8 2000

Mr. Eric G. Poole
Logistics Administrator
ELG Haniel Trading Corporation
PO Box 399
McKeesport, PA 15134

Ref. No. 00-0038

Dear Mr. Poole:

This is in response to your letter requesting confirmation that the ferrosilicon you purchase and resell is not subject to the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). You state that your product was tested in accordance with the test method described in Appendix E to Part 173, and found it does not meet the definition of a Division 4.3 (Dangerous When Wet) material.

As provided in § 173.22 it is the shipper's responsibility to properly classify a hazardous materials. However, if the ferrosilicon sold by your company is the same material that was tested in accordance with the U.N. Manual of Tests and Criteria and determined not to meet the Division 4.3 criteria, it is not subject to the HMR.

I hope this satisfies your request.

Sincerely,

Thomas G. Allan
Senior Transportation Regulations Specialist
Office of Hazardous Materials Standards



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172.101(4)



U.S. Department of Transportation
Research and Special Programs Administration
400 Seventh Street, S.W.
Washington, D.C. 20590
FAX NO.: 202/366-3012

**ELG HANIEL
TRADING CORPORATION**
P.O. Box 399
15th Street & River Road
McKeesport, PA 15134
(412) 672-5502
Fax: (412) 672-5494

*Twittery
\$172.101 (F)
ferrosilicon
00-0038*

February 3, 2000

Dear Sir or Madam,

We are ELG Haniel Trading Corporation and we specialize in the importation and sales of ferroalloy material. We are importers of 75% Ferrosilicon in bulk. This material originates in Russia and is provided by Chelyabinsk Electro-Metallurgical Integrated Plant in Chelyabinsk, Russia. We have had Andrew S. McCreath & Son, Inc. perform the DOT tests to determine if this product is a hazard when wet per DOT standard 173 part 4.3. This result concluded that this material should not be classified as a hazardous material (results attached). Please provide any authorization deemed necessary in order for this Ferrosilicon to be shipped not subject to hazardous materials regulations. Thank you for your cooperation.

Sincerely Yours,

A handwritten signature in cursive script, appearing to read 'Eric G. Poole'.

Eric G. Poole

Logistics Administrator

SENT BY: ASMCCREATH

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Andrew S. McCreath & Son, Inc.

ANALYTICAL AND CONSULTING CHEMISTS

810 Willow Street
P.O. Box 1453
Harrisburg, PA 17105-1453
Telephone: (717) 238-9331
Telex: 84-2921
Fax: (717) 238-4943

February 1, 2000

ELG Haniel Trading Corporation
15th Street & River Road
P.O. Box 369
McKeesport, Pennsylvania 15134

Gentlemen:

The sample received from Hoff & Co. Services B.V. on January 27, 2000, marked: Storage at Ventspils, Latvia, December 8, 9, and 10, 1999, Lot No. 4A, Approx. 715 Metric Tons of Ferro Silicon - Grade 75% Si (ex 11 RR Waggon), on behalf of: Ferroexport, Chelyabinsk, Russia, Contract No. UN-010/99 and UN-021/99, Date: Maasvluis, December 13, 1999, 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)	No Spontaneous Ignition
Division 4.3 a (2)	No Spontaneous Ignition
Division 4.3 a (3)	No Spontaneous Ignition

Gas Evolution Measurement

Total volume in Ml each hour.

<u>Time Interval</u>	<u>Test 1</u>	<u>Test 2</u>	<u>Test 3</u>
1 Hour	0.00 Ml	0.20 Ml	0.00 Ml
2 Hour	0.10 Ml	0.30 Ml	0.00 Ml
3 Hour	0.10 Ml	0.30 Ml	0.00 Ml
4 Hour	0.10 Ml	0.30 Ml	0.00 Ml
5 Hour	0.10 Ml	0.30 Ml	0.00 Ml
6 Hour	0.10 Ml	0.30 Ml	0.00 Ml
7 Hour	0.10 Ml	0.30 Ml	0.00 Ml
Total	0.10 Ml	0.30 Ml	0.00 Ml

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DOT Test

Maximum Rate - 0.008 liter/hour/kilogram

Average Rate - 0.0008liter/hour/kilogram

Lab #00012719

Yours very truly,

ANDREW S. McCREATH & SON, INC.

