



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

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

OCT 12 2005

Mr. Rory Butler
Holman Fenwick & William
Marlow House, Lloyds Avenue
London, EC3N 3AL

Ref. No. 05-0131

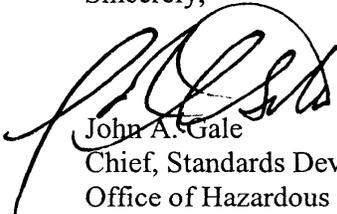
Dear Mr. Butler:

This is in response to your e-mail dated May 18, 2005 requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to Calcium hypochlorite, dry (UN1748). Specifically, you ask for the permissible moisture content of "Calcium hypochlorite, dry" (UN1748).

The HMR do not specifically address the permissible moisture content of Calcium hypochlorite, dry. However, as your email notes, Calcium hypochlorite, hydrated (UN2880) has a specific range of not less than 5.5 percent but not more than 16 percent water. Therefore, the moisture content of Calcium hypochlorite may not exceed 5.5 percent in order for the material to be classed as "Calcium hypochlorite, dry."

I hope this information is helpful.

Sincerely,



John A. Gale
Chief, Standards Development
Office of Hazardous Materials Standards



050131

172.101 (CS)

Gorsky, Susan <PHMSA>

From: Rory Butler [Rory.Butler@hfw.co.uk]
Sent: Wednesday, May 18, 2005 10:57 AM
To: Gorsky, Susan <PHMSA>
Cc: amanda.rathbone@cliffordchance.com
Subject: Moisture Content of Dry/Anhydrous Calcium Hypochlorite UN1748

Foster
\$172.101 (c)
Applicability
05-0131

PLEASE READ THE IMPORTANT NOTICE BELOW

Dear Susan

I understand from Shane Kelley that he has already passed my query on to you.

I thought it may assist if I e-mailed across the basic question:

I would be grateful if you could clarify the permitted moisture content of dry or anhydrous calcium hypochlorite (UN1748) under the CFR. The CFR/IMDG code is silent on this point. (Or indeed clarify the position by reference to any other relevant US regulations).

Hydrated calcium hypochlorite (UN2880) is permitted to have a moisture content of between 5.5% to 16% (previously 5.5% to 10%).

It could be argued (by logical inference) that dry or anhydrous calcium hypochlorite should have a moisture content of between 0 and 5.5% although equally it could be argued that the moisture content should be less than 1% (if you took a strict definition of anhydrous).

I are aware that a number of companies ship material as UN1748 with a moisture content of between 1% and 5.5%, obviously we wonder is this permitted?

I would be grateful for any clarification you can offer, or any documents you could provide that confirm the permitted moisture content of UN1748 in the US.

If you have any questions or would like to discuss the above please do not hesitate to call.

This request is rather urgent and I would be grateful if you could reply during tomorrow if at all possible as your response may impact on a current matter.

Thank you for your assistance.

Best regards

Rory Butler

Rory Butler
Holman Fenwick & Willan
Direct Dial: 020 7264 8310
Fax: 020 7481 0316
e-mail: rory.butler@hfw.co.uk

>>> "Kelley, Shane <PHMSA>" <shane.kelley@dot.gov> 05/18/05 3:29 pm >>>
> Mr. Butler,
>
> I was able to speak with Bob Richard and Charles Ke. Dr. Ke
> recommended you contact Susan Gorsky at (202) 366-4545 or by e-mail at
> susan.gorsky@dot.gov
>
> I understood your question to be: What is the proper classification
> of Calcium Hypochlorite at moisture levels of between 3 and 5%?
>
> I forwarded this question to Susan, but you may want to be in touch

> directly with her since I know you are on a tight schedule.

>
> Best Regards,

Shane Kelley

> _____
>
> Shane C. Kelley
> International Transportation Specialist
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