



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

MAR 03 2008

Mr. John Anderson  
Airgas-SAFECOR  
P.O. Box 20067  
Cheyenne, WY 82003

1200 New Jersey Avenue, SE  
Washington, D.C. 20590

Reference No. 08-0018

Dear Mr. Anderson:

This is in response to our January 15, 2008 telephone conversation and your e-mail concerning the entry "Chlorodifluoromethane *or* Refrigerant Gas R 22, 2.2 (non-flammable gas), UN 1018" appearing in the § 172.101 Hazardous Materials Table (HMT; 172.101) of the Hazardous Materials Regulations (HMR). The HMT lists "Chlorodifluoromethane" and "Refrigerant Gas R 22" in Roman type. You state your company receives the material from different vendors in packages marked with either proper shipping name. You ask if your company's shipping paper may display both proper shipping names or if it must display only one.

When one proper shipping name includes alternative wording choices that appear in Roman type in a sequence and are separated by the word "*or*" in italics, such as "Articles, pressurized pneumatic *or* hydraulic *containing non-flammable gas*," it is the intent of § 172.101(c)(2) that Roman type wording choice that appropriately describes the material, e.g., pneumatic or hydraulic, must be used. However, in your scenario, both Roman type names describe the same material. Therefore, it would be permissible to show the proper shipping name as "Chlorodifluoromethane *or* Refrigerant gas R22."

I hope this satisfies your request. If you have any further questions, please contact this office at (202) 366-8553.

Sincerely,

Hattie L. Mitchell  
Chief, Regulatory Review and Reinvention  
Office of Hazardous Materials Standards

Edmonson  
§ 172.101  
§ 172.202

Shipping Papers  
08-0018

**Drakeford, Carolyn <PHMSA>**

**From:** Mitchell, Hattie <PHMSA>  
**Sent:** Tuesday, January 15, 2008 7:29 AM  
**To:** Drakeford, Carolyn <PHMSA>  
**Subject:** FW: Proper shipping name description on a hazardous material shipping paper

**From:** John Anderson (SAFECOR) [mailto:John.Anderson.SAFECOR@Airgas.com]  
**Sent:** Monday, January 14, 2008 3:35 PM  
**To:** Mitchell, Hattie <PHMSA>  
**Subject:** Proper shipping name description on a hazardous material shipping paper

Good afternoon,

Per our phone conversation this afternoon, would the following description be acceptable.

Chlorodifluoromethane *or* Refrigerant Gas R22 2.2 UN1018

Our question is can we both descriptions (Chlorodifluoromethane *or* Refrigerant Gas R22) or are we only allowed to use one?

If you would prefer this question as an actual letter instead of an email, please let me know.

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Fax 1-307-778-7497  
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