



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

MAY 31 2018

Randolph Martin
The Chemours Company
1007 Market Street, Room 2024
Wilmington, DE 19899

Reference No. 18-0009

Dear Mr. Martin:

This letter is in response to your January 11, 2018, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to bulk packaging requirements for "UN1689 Sodium cyanide, solid, 6.1, Packing Group (PG) I" and "UN3414 Sodium cyanide solution, 6.1, PG III."

We have paraphrased and answered your questions as follows:

- Q1. You ask whether "UN1689 Sodium cyanide, solid, 6.1, PG I" is authorized for transport in non-DOT specification cargo tank motor vehicles (CTMV).
- A1. The answer is no. Section 172.102(c)(3), Special Provision B69 authorizes several non-specification packagings for "UN1689 Sodium cyanide, solid, 6.1, PG I." It is the opinion of this Office that a non-specification CTMV is not an authorized packaging. Please note that alternate packaging methods for this material, such as a non-specification CTMV, may be authorized under the terms of an approval (see § 172.102(c)(3), Special Provision B77).
- Q2. You ask whether "UN3414 Sodium cyanide solution, 6.1, PG III" is authorized for transport in a non-DOT specification CTMV.
- A2. The answer is yes. Section 173.241(b) authorizes non-DOT specification CTMVs suitable for transport of liquids for "UN3414 Sodium cyanide solution, 6.1, PG III."

I hope this information is helpful. Please contact us if we can be of further assistance.

Sincerely,

Dirk Der Kinderen
Chief, Standards Development Branch
Standards and Rulemaking Division

Patrick
Cargo Tanks

January, Ikeya CTR (PHMSA)

18-0009

From: INFOCNTR (PHMSA)
Sent: Friday, January 12, 2018 2:35 PM
To: Hazmat Interps
Subject: FW: Formal Interpretation

Hello All,

Below is another interp request from Mr. Martin. He and I have spoken over-the-phone regarding his question, but he would like written guidance confirming what we discussed.

Regards,

-Breanna

From: Martin, Randy [mailto:RANDOLPH.MARTIN@chemours.com]
Sent: Thursday, January 11, 2018 1:25 PM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Subject: Formal Interpretation

This is to request a formal interpretation of the hazmat regulations, under 49 CFR 105.20.

We spoke with a member of your staff on Jan 10 concerning the transport of 2 hazardous materials in non-DOT specification cargo tank motor vehicles. She indicated that these motor vehicles are authorized packagings for both materials and we wish to confirm.

The hazardous materials are correctly classified as:

UN1689
Sodium Cyanide, Solid
6.1
PG I

and:

UN3414
Sodium Cyanide Solution
6.1
PG III

Our question is – are these materials authorized for transport in non-DOT specification cargo tank motor vehicles?

We believe that both are: UN1689 under 172.102(c)(3) Special Provision B69, and UN3414 under 173.241.

Thanks for your prompt attention to this request and please let me know if you have any questions.

Randolph Martin
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