



U.S. Department  
of Transportation

**Research and  
Special Programs  
Administration**

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

FEB 12 1998

Mr. Ron Shan  
Sierra Chemical, Co.  
P.O. Box 12550  
Sparks, NV 89510

Dear Mr. Shan:

This is in response to your letter concerning the use of the proper shipping description "Hypochlorite solutions, 8, UN 1791, PG III" for your product containing 12.5 percent sodium hypochlorite solution by weight and 87.5 percent of an inert ingredient. You stated that your company was cited by the California Highway Patrol for not including "(sodium hypochlorite solution)" as a part of the shipping description. You also stated that this material is packaged in containers varying in size from 5 gallons to one cargo tank, and enclosed copies of your shipping paper for our review. I apologize for the delay in responding and any inconvenience this may have caused.

Based on your enclosed shipping papers, when shipped in a cargo tank, the Sodium hypochlorite meets or exceeds its 100 lb. reportable quantity listed in Appendix A to 49 CFR 172.101, and, therefore, is regulated as a hazardous substance. See § 171.8. Section 172.203(c) provides that, if the proper shipping name does not identify the hazardous substance by name, the name of the hazardous substance must be entered in parentheses in association with the basic description. This section also requires that the letters "RQ" appear either before or after the basic description for a hazardous substance.

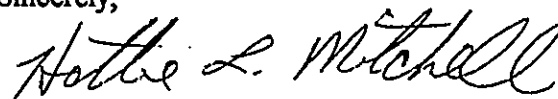
Please note that the required shipping description means the basic description required by § 172.202 and additional description information required by § 172.203. Section 172.202 prescribes that the basic description consisting of the proper shipping name for the material, as identified in § 172.101 of the Hazardous Material Table, the hazard class, the identification number and the packing group, if any, must be shown in sequence with no additional information interspersed.

Additional information, such as that prescribed by § 172.203, or other additional information concerning a hazardous material must be placed after the basic description on a shipping paper, except that certain notations such as "RQ" may appear before the proper shipping name, and a technical name or chemical group name for a generic description may follow the proper shipping name. Other information allowed to be placed before the basic description is quantity shipped, and the type of packaging and destination marks (see § 172.201 (a)(2)(iii), § 172.201 (a)(4) and § 172.202 (c)). For example, shipping papers that are designed in columnar form may have the quantity shipped and type of packaging, e.g., "19 drums" entered before the basic description.

Other information such as the item number, quantity ordered, or back order must be entered on the shipping paper after the basic description.

I hope this information is helpful. Please contact us if we can assist you further.

Sincerely,

A handwritten signature in cursive script that reads "Hattie L. Mitchell". The signature is written in black ink and is positioned below the word "Sincerely,".

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



2302 LARKIN CIRCLE  
 SPARKS, NEVADA  
 P.O. BOX 12550  
 RENO, NEVADA 89510  
 TELEPHONE (702) 358-0888  
 FAX (702) 358-0987

# SIERRA CHEMICAL Co.

Betts  
 File 172.203(K)  
 SC: 210, 174

January 22, 1997

Certified Mail

Office of Hazardous Materials Standards (DHM-10)  
 Research and Special Programs Administration  
 U.S. Department of Transportation  
 400 Seventh St., S.W.  
 Washington, DC 20590.

RE: Proper shipping name of Hypochlorite solution

Dear Official:

Please provide your opinion and expertise on the legal shipping name of a US EPA registered product 12.5% by weight of sodium hypochlorite solution (with a inert ingredient of 87.5%), the container size varies from 5 gallons to a cargo tanker. Derived from 49 CFR 172.101 Hazardous material table, we currently use the following proper shipping name:

**- Hypochlorite solutions, 8, UN 1791, PG III**  
 (Enclosed are copies of shipping papers for two different container sizes, one being a 5 gallon carboy and the other bulk).

However, we had been cited by California Highway Patrol officer that the above shipping name is incorrect, it should read:

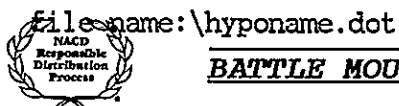
**Hypochlorite solutions, 8, UN 1791, PG III  
 (sodium hypochlorite solution)**

Please clarify the above matter and contact me at (702) 358-0888 if I can be of further assistance to you.

Sincerely,

Ron Shan  
 Chemical Engineer

c.c. Stan Kinder (Sierra Chemical Co.)



BATTLE MOUNTAIN ♦ MUSTANG ♦ ROCKLIN ♦ SPARKS ♦ STOCKTON

ORDER NO. 50892

ORDER NO. 50892

ORDER DATE 1/13/97



CHEMICAL CO.

2302 LARKIN CIRCLE • SPARKS, NEVADA 89431 • (702) 358-0888

ALL CORRESPONDENCE TO: P.O. BOX 12550 RENO, NEVADA 89510

Ernie 882-9331

SOLD TO MISSION OF NEVADA, INC. 1161 FAIRVIEW DRIVE CARSON CITY, NV 89701

SHIP TO MISSION LINEN SUPPLY 2401 1161 FAIRVIEW DR. CARSON CITY, NV. 89701

Form with fields: CASH, CHARGE, CREDIT, MEMO, CUSTOMER NO. 8000000, SHIP TO NO. 1, 24 HOUR EMERGENCY CONTACT Sierra Chemical Co. (702) 747-6283 (702) 849-5500 Pager, Chemtrec 1-800-424-9300

Form with fields: DATE REQUESTED 1/13/97, DATE SHIPPED 1/14/97, SHIPPED BY SPARKS, CUSTOMER P.O. NO. ERNIE, CONTRACT NO. C8000, W/R 1, DROP SHIP, RESALE, SALES TAX EXEMPT, STATE, LOCAL, SALESMAN 04, REQ. NO. 9

Table with columns: ITEM NUMBER, B.O., ORDERED, SHPD, H/M, UNIT, DESCRIPTION, TOTAL DOT QTY, UNIT PRF. Includes items 284882, 262145, 590002 and a large SIERRA logo watermark.

Table with columns: Deposit Containers In, Serial Numbers, Deposit Containers Out, Serial Numbers, Container Chgs., Merchandise Total, Freight Total, Sales Tax, Container Charge, Total. Includes handwritten total of \$78.38.

SPECIAL INSTRUCTIONS: TRUCK NO., DROP TRL, GROSS, TARE, NET

TERMS: NET 30 DAYS. SEE REVERSE SIDE FOR ADDITIONAL PERTINENT INFORMATION. I RECEIVED THE ABOVE MERCHANDISE AND AGREE TO TERMS & CONDITIONS ON REVERSE SIDE. SIGNED [Signature] DATE 1-14-97. LOAD COUNTED AND CHECKED. DRIVER. ORDER NO.

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation. F.L. KINDER, AGENT

FCM: DATE ORDERED WILL SHIP ORDERED FROM P.O. NUMBER

CONTROL

420

ORDER NO. 50897

ORDER NO. 50897

ALL CORRESPONDENCE TO: P.O. BOX 12550 RENO, NEVADA 89510



CHEMICAL CO.

2302 LARKIN CIRCLE • SPARKS, NEVADA 89431 • (702) 358-0888

ORDER DATE 1/13/97

CUSTOMER NO. 10421000

SOLD TO

PRESSURE VESSEL

7625 W, SUNNY VIEW AVENUE VISALIA, CA 93291

SHIP TO

PRESSURE VESSEL

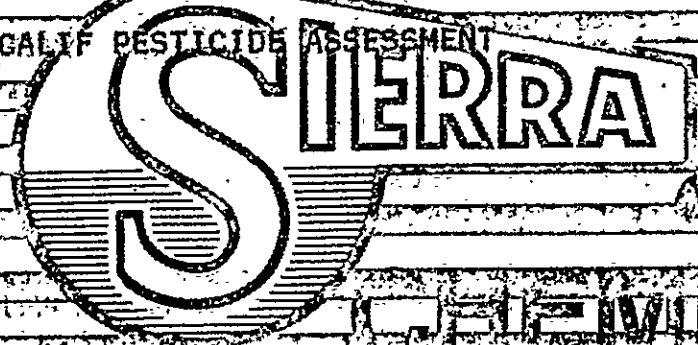
2280

7625 W, SUNNY VIEW AVENUE VISALIA, CA 93291

CASH	CUSTOMER NO. 10421000
CHARGE	SHIP TO NO. 1
CREDIT	24 HOUR EMERGENCY CONTACT Sierra Chemical Co. (702) 747-6283 (702) 849-5500 Pager
MEMO	Chemtrec 1-800-424-9300

DATE REQUESTED 1/15/97	DATE SHIPPED	SHIPPED BY STOCKTON	CUSTOMER P.O. NO. 4CA97VS	CONTRACT NO. C0421	W/H S	DROP SHIP	RESALE <input type="checkbox"/>	SALES TAX EXEMPT <input type="checkbox"/>	STATE <input type="checkbox"/>	LOCAL <input type="checkbox"/>	SALESMAN 03	REQ. NO.
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ITEM NUMBER	B.O.	ORDERED	SHPD	H/M	UNIT	DESCRIPTION	TOTAL DOT QTY	UNIT PRICE
284777	GAL	4700	RQ			HYPOCHLORITE SOLUTIONS, 8, UN1791, PGLII ***SIERRA PURE CHLOR BULK T/L***		
590093	EA	1				GALIF PESTICIDE ASSESSMENT		



Deposit Containers In	Serial Numbers	Deposit Containers Out	Serial Numbers	Container Chgs.	MERCHANDISE TOTAL
				Amt Debited	FREIGHT TOTAL
				Amt Credited	SALES TAX
				Total	CONTAINER CHARGE
					TOTAL

SPECIAL INSTRUCTIONS:	TRUCK NO.	GROSS
	DROP TRL	TARE
		NET

TERMS: NET 30 DAYS. SEE REVERSE SIDE FOR ADDITIONAL PERTINENT INFORMATION.

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation. F. L. KINDER, AGENT

ORDER NO.

I RECEIVED THE ABOVE MERCHANDISE AND AGREE TO TERMS & CONDITIONS ON REVERSE SIDE.

SIGNED \_\_\_\_\_ DATE \_\_\_\_\_ LOAD COUNTED AND CHECKED \_\_\_\_\_ DRIVER \_\_\_\_\_

RCM: DATE ORDERED WILL SHIP ORDERED FROM P.O. NUMBER