



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

JUL 1 1999

Mr. Inman Beavers
Dangerous Goods Coordinator
Delta Air Lines Inc.
2nd Floor Domestic Cargo Bldg.
1600 Aviation Blvd.
Atlanta, GA 30320

Ref. No. 99-0089

Dear Mr. Beavers:

This is in response to your letter dated March 30, 1999 concerning the technical name(s) requirements for a gas mixture as required by the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). You describe the mixture as "Compressed gas, n.o.s., 2.2, UN1956" and supply a material safety data sheet (MSDS) which includes ratios of the various gases which make up the mixture. You ask for guidance in determining which components in the mixture would be listed as technical names.

Section 172.203(k)(2) requires the technical names of at least two components most predominately contributing to the hazards of a mixture or solution which contains two or more hazardous materials be included in the shipping description. In your scenario, the MSDS which you included lists oxygen and nitrogen as the two main components of the mixture. While the mixture also contains small amounts of hydrogen sulfide and carbon monoxide, which are both Division 2.3 materials, the mixture is classified as a Division 2.2 material. The technical names must identify the components which predominately contribute to the hazards the material exhibits, which was have determined to be Division 2.2. Thus, the technical names would be oxygen and nitrogen.

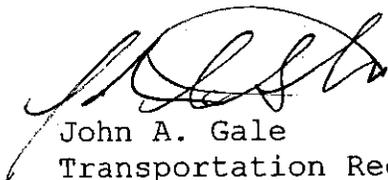


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I hope this satisfies your request.

Sincerely,

A handwritten signature in cursive script, appearing to read 'J. A. Gale', written in dark ink.

John A. Gale
Transportation Regulations Specialist
Office of Hazardous Materials Standards

BAH

§ 172.203

Delta Air Lines Inc.

% Inman Beavers
2nd Floor Domestic Cargo Bldg.
1600 Aviation Blvd.
Atlanta Georgia
30320
99-0089

March 30, 1999

Office of Hazardous Materials Standards

To whom it may concern:

I have been talking with a shipper of a "Calibration Unit" which is a non-refillable cylinder containing a mixture of gases (please see attached MSDS).

I believe the shipper may have chosen the wrong technical name for the gas mixture. Please review the attached MSDS and provide me with a letter of interpretation to determine the appropriate proper shipping name.

The shipper has Classified the gas mixture as UN 1956, Compressed gas n.o.s. (Hydrogen sulfide, Carbon monoxide), Class and Division 2.2. The shipper cites 49 CFR 172.203 k (2) as the reference.

I did speak with Mike Stevens at the DOT Hazardous Materials Hot line on 29 March 1999 concerning this material.

Sincerely,

Inman Beavers
Dangerous Goods Coordinator
Phone - 404-714-8192
Fax - 404-714-7174