



U.S. Department  
of Transportation  
**Research and  
Special Programs  
Administration**

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

APR 19 2000

Mr. T. Jeff Jones  
Delta Analytical Corporation  
7910 Woodmont Avenue, Suite 1000  
Bethesda, Maryland 20814

Ref. No. 00-0073

Dear Mr. Jones:

This is in response to your letter dated February 22, 2000, regarding whether sodium hypochlorite solutions containing less than 5.25% and 6.8% available chlorine is subject to the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). You provided data for both the 5.25% and 6.8% sodium hypochlorite solutions.

Based on the data you provided, this Office concurs with your opinion that both of the sodium hypochlorite solutions containing less than 5.25% and 6.8% available chlorine, respectively, would not be classed as corrosive material in accordance with the definition specified in 49 CFR 173.136. Thus, your products, containing these amounts of sodium hypochlorite solutions, are not subject to the requirements of the HMR for purposes of transportation in commerce.

I hope this satisfies your inquiry. If we can be of further assistance, please contact us.

Sincerely,

Delmer F. Billings  
Chief, Standards Division  
Office of Hazardous Materials Standards



000073

173.22



Englum  
\$ 173.22  
00-0073

February 22, 2000

Mr. Delmer F. Billings  
Chief, Standards Development  
Office of Hazardous Material Standards  
US Department of Transportation  
400 Seventh Street, SW  
Washington, DC 20590

Re: Corrosivity of Sodium Hypochlorite Solutions; Your Letter of October 7, 1999

Dear Mr. Billings:

Thank you for your letter of October 7, 1999.

After receiving your letter, my client, KIK Corporation, tested both 5.25% and 6.8% sodium hypochlorite solutions for corrosivity at Product Safety Labs, East Brunswick, NJ. The results of those studies are attached. The conclusion of both studies was that "[n]o sign of dermal corrosion was noted at any of the treated sites."

Assuming on review that you agree with the conclusions of these studies, I would appreciate your issuing a letter confirming the Department's conclusion that the sodium hypochlorite solutions tested are not corrosive materials within the meaning of current regulatory guidelines. That letter would be patterned after the letter issued to The Clorox Company on February 6, 1991, which we've discussed in previous correspondence (attached).

Thank you for your quick attention to this matter. If you need additional information, please contact me at your earliest convenience.

Sincerely,

T. Jeffrey Jones  
Enclosures

g:\kik\dot00301.wpd

7910 Woodmont Avenue Suite 1000 Bethesda, Maryland 20814  
(301) 652-5495 FAX (301) 652-5408