



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

SEP 25 2000

Mr. Chris Corea
Regulatory Compliance Services
6740 Huntley Road
Suite 203
Worthington, Ohio 43229

Ref. No. 00-0201

Dear Mr. Corea:

This is in response to your letter dated July 20, 2000, requesting clarification on the proper shipping name for denatured alcohol under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). In your letter you reference three shipping names: "Ethanol solutions, 3, UN1170," "Flammable liquids n.o.s., 3, UN1993," and "Alcohols, n.o.s., 3, UN1987." Specifically, you asked which shipping name is most appropriate for a denatured alcohol.

Under § 173.22, it is the shipper's responsibility to properly classify a hazardous material and assign it a proper shipping name from the Hazardous Materials Table (HMT). For a material not specifically identified by name in the HMT, the HMR requires that the material be described by the shipping name that "most appropriately describes" the material. In some cases, more than one shipping name could "most appropriately describe" a material. However, it is the opinion of this Office that the shipping name "Ethanol solutions" most appropriately describes denatured alcohol.

I hope this satisfies your request.

Sincerely,

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



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S 172-101(c)
00-0201

July, 20, 2000

Mr. Edward T. Mazzullo
Director, Office of Hazardous Materials Standards
U.S. DOT/RSPA (DHM-10)
400 7th Street S.W.
Washington, D.C. 20590-0001

RE: Proper Shipping Description of Denatured Ethanol

Dear Mr. Mazzullo,

This letter is a request for interpretation regarding the proper shipping description of Denatured Alcohol.

During my course of research, the three descriptions found most in industry are the following:

"Ethanol Solutions, 3, UN1170" or
"Flammable Liquids n.o.s., 3, UN1993"
"Alcohols, n.o.s., 3, UN1987"

From the selections, I can understand the reasoning behind the three:

Ethanol Solutions - the majority of the product is composed of Ethanol with approximately 5 percent of Isopropanol and/or Methanol. Since the product is not entirely composed of Ethanol, the "Ethanol Solutions" designation is used as the proper shipping description.

Flammable Liquids n.o.s. - although the majority of the product is Ethanol, the other constituents (Isopropanol and/or Methanol) contribute to the overall hazard or flammability. As such the designation of a "Flammable Liquid, N.O.S." seems an accurate shipping description.

Alcohols, n.o.s. - all constituents found in the product are alcohols (ethyl alcohol, methyl alcohol, isopropyl alcohol). As such, this description seems to accurately describe the material because they all contribute to the hazard.

Denatured alcohol is a hazardous material prevalently used throughout all of industry and any interpretation that can be provided would be greatly appreciated. If you have any further questions or concerns regarding this issue, please do not hesitate to contact me at the office at (614) 888-8825 ext. 14. Thank you for your anticipated cooperation.

Very Truly Yours,


Chris Corea
Senior Technical Consultant - RCS, Inc.