



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

JAN 22 2001

Mr. Michael Brobst
Goldschmidt Chemical Corp.
5777 Frantz Road
Dublin, Ohio 43017

Ref. No. 00-0294

Dear Mr. Brobst:

This responds to your October 18, 2000 letter requesting clarification on the classification of your material under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you request clarification on the proper hazard class of a solid material containing 10-20% alcohol (isopropyl or ethanol), water, and a non-hazardous organic material.

Under § 173.22, it is the shipper's responsibility to properly classify a hazardous material. This Office generally does not perform that function. You state that your mixture is a solid and does not meet the hazard class criteria for a Class 3 flammable liquid material, a Division 4.1 flammable solid material nor any other hazard class defining criteria in Part 173, and is not a hazardous waste, hazardous substance, or marine pollutant. Therefore, this material is not subject to the HMR.

I hope this answers your inquiry.

Sincerely,

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



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telefax message

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2. . . . 173.22
Proper Shipping Name
Class
00-0294

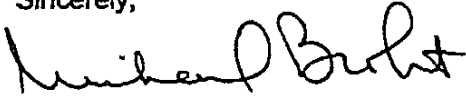
to: Office of Hazardous Materials Standards
FAX: 202-366-3012
from: Michael Brobst, Mgr. Product Stewardship
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FAX: 614-764-1481
E-MAIL: mike.brobst@us.goldschmidt.com
PAGES: 01
DATE: Oct. 18, 2000

Re: Classification

I have a material(s) that contain 10-20% alcohol (isopropyl or ethanol), water, a non-haz fatty organic material. This does not meet the definition of liquid in 49CFR 171.8, with an initial melt point of >97F. Now I have a solid material, but one that does not pass the Flammable Solid Preliminary Screening Test described in the UN Manual of Tests and Criteria (33.2.1.4.3.1).

How do I properly describe this material?? It is not a flammable liquid, nor is it a flammable solid, nor does it meet another hazard class.

Sincerely,



Michael Brobst
Manager, Product Stewardship/Regulatory