



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

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

MAR 14 2001

Ref. No. 01-0002

Mr. Roger L. Maxon
Bernzomatic
One Bernzomatic Drive
Medina, New York 14103

Dear Mr. Maxon:

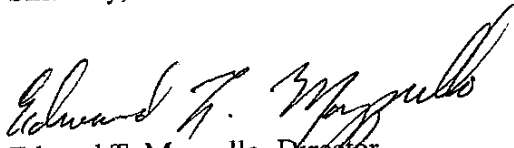
This responds to your letter dated January 4, 2001 requesting clarification on the proper shipping description, under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180), for your BF-9 cylinder used to fill butane torches.

According to your letter, Bernzomatic merchandises a small, non-refillable cylinder filled with butane as a fuel source for various products. The primary use for this cylinder is to allow customers to fill butane torches distributed by your company. You state that on January 3, 2001, a DOT inspector cited Bernzomatic stating that the proper shipping name for the product should be "Lighter Refills, 2.1, UN 1057." Bernzomatic had described the product in the cylinder as "Petroleum gas, liquefied, 2.1, UN 1075." You believe "Petroleum gas, liquefied, 2.1, UN 1075" most appropriately describes the product and that this description would be better recognized by an emergency responder.

Under the provisions of § 173.22, it is the shipper's responsibility to properly class and describe a hazardous material. This Office does not normally perform that function. However, based on the information provided in your letter and attachment, it is the opinion of this Office that your product may be appropriately described as: "Petroleum gas, liquefied, 2.1, UN 1075," or "Butane, 2.1, UN 1011." In addition, if your product is used as a lighter refill your product may also be described as "Lighter Refills, 2.1, UN 1057." Further, the proper shipping name you select will determine the authorized packaging for the product. In every instance Emergency Response Guidebook guide number 115 applies to each of these shipping descriptions.

I hope this answers your inquiry.

Sincerely,


Edward T. Mazzullo, Director
Office of Hazardous Materials Standards



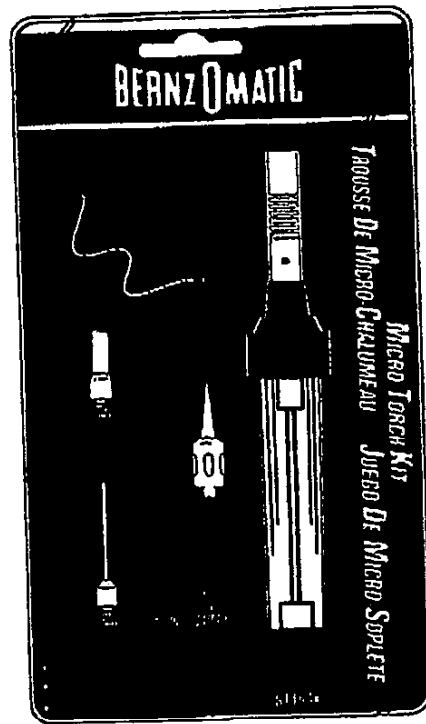
010002

173.22

MICRO-TORCH MICRO-CHALUMEAU MICRO-SOPLETE



ST100T



ST150K



ST1000TS



**BF9
BUTANE CYLINDER**

