



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

SEP 20 2001

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

Mr. Charles Ho
Senior Manager
Zhen Hua Trading Limited
Room 2003, 20/F, C. C. Wu Building
302-308 Hennessy Road
Wanchai, Hong Kong

Ref. No. 01-0051

Dear Mr. Ho:

This responds to your letter regarding the classification of "wood charcoal" as a dangerous good under the U.S. Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) and your plans to export this product to the U.S.

Under the HMR, it is the shipper's responsibility to determine whether a material meets the definition of a hazard class or is not subject to the regulations. Such determinations are not normally performed by this office. We will, however, provide assistance when possible, in the classification of a material.

Your letter did not describe the composition or physical form of the wood charcoal. Wood charcoal may meet the definition of a Division 4.2, spontaneously combustible material, if, after testing in accordance with the UN Manual Tests and Criteria (extract enclosed) it is determined the charcoal meets the hazard class criteria. However, if the material does not meet the definition of Division 4.2 or any other hazard class or division in the HMR, the material would not be subject to the HMR.

For information regarding trade with the U.S., we suggest that you contact the United States Department of Commerce's Trade Information Center at tic@ita.doc.gov or the International Trade Administration at 1-800-USA-TRADE.

I trust this satisfies your inquiry. Please contact us if we can be of further assistance.

Sincerely,



John Gafe

Transportation Regulations Specialist
Office of Hazardous Materials Standards

Enclosure



010051

171.12



振華貿易有限公司
Zhen Hua Trading Limited

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<http://www.zhenhua.com.hk> <http://www.woodcharcoal.com>

Stevens
§171.12
Export
Applicability
01-0051

Ref:zhbvi\other\inquiry\usdot01

29 January 2001

U.S.Department of Transportation

Tel: 202 3664488

Office of Hazardous Materials

400 7th Street SW

Washington, DC 20590-0001

U.S.A.

Attn: Director

Dear Sir/ Madam,

Inquiry of the Importation of Wood Charcoal

We are a company dealing with charcoal business in Hong Kong, and we plan to export charcoal products to US. We would like to know the following inquiries:

1. Whether there are any restrictions imposed by the US when wood charcoals are imported into US. Any quota, license, or other documents are required before we export.
2. Whether our wood charcoals would be classified as dangerous goods during transport, loading and unloading. If they are really classified as dangerous goods, what suggestions you could provide us to solve that problem.

Thank you for your kind attention and look forward to receiving your soon reply.

Kind regards

Charles Ho

Senior Manager

CH/MF