



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

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

JUL 26 2001

Mr. Dan Smith  
Senior Product Specialist  
Environmental Health and Safety  
Ashland, Inc.  
P. O. Box 2219  
Columbus, OH 43216

Reference No.: 01-0160

Dear Mr. Smith:

This is in response to your letter regarding the placement of technical and chemical group names in shipping descriptions under the Hazardous Materials Regulations (49 CFR Parts 171-180). Specifically, you ask if the placement of technical and chemical group names between the proper shipping name and hazard class applies to any proper shipping name as long as the information is appropriate and not inconsistent with the proper shipping name.

The answer is yes. Section 172.202(d) authorizes, without limitations, the placement of technical and chemical group names between the proper shipping name and hazard class. Xylene may be described as "Xylenes (Xylene, Ethyl Benzene), 3, UN1307, PG III".

I trust you find this information helpful.

Sincerely,

Hattie L. Mitchell  
Chief, Regulatory Review and Reinvention  
Office of Hazardous Materials Standards



G. W. Hammer  
Vice President  
Environmental, Health and Safety  
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Corbin  
§172.202(d)  
Shipping Papers  
01-0160

RSPA Office of Hazardous Materials Standards (DHM-10)  
U.S. Department of Transportation  
400 Seventh St. SW  
Washington, DC 20590-0001

RE: Shipping Papers

The purpose of this letter is to respectfully request that RSPA review certain provisions of the Hazardous Materials Regulations and issue a written opinion on the questions presented below.

Section 172.202(d) states that "technical and chemical group names may be entered in parentheses between the proper shipping name and hazard class".... Our understanding is that this applies to any proper shipping name as long as the information is appropriate and not inconsistent with the proper shipping name. For example, Xylenes, a proper shipping name listed on the Hazardous Materials Table usually consists of o-xylene, p-xylene and ethylbenzene as well as small quantities of toluene. (See attached manufacturing information).

In accordance with 172.202(d), we believe the following shipping paper description is appropriate for this material.

Xylenes  
(Xylene; Ethyl Benzene)  
3, UN1307, PG III

Your written opinion and comments are appreciated.

Please advise if you require any additional information.

Sincerely,



Dan Smith  
Senior Product Specialist  
Environmental Health and Safety

... taken from TOXNET - Hazardous Substances Database  
<http://toxnet.nlm.nih.gov/cgi-bin/sis/search/f?./temp/~BAAjWaGLP:1>

### General Manufacturing Information:

The commercial product mixed xylenes (a technical product generally containing 20% each of o-xylene, p-xylene and ethylbenzene, as well as small quantities of toluene) analogously to toluene is an agent of major chemical and occupational significance. It is produced in very large quantities and is extensively employed in a broad spectrum of applications, primarily as a solvent for which its use is increasing as a safe replacement for benzene, and in gasoline as part of the BTX component (benzene-toluene-xylene); xylenes are also frequently used in the rubber industry with other solvents such as toluene and benzene. As individual isomers they are extensively employed in the synthesis of synthetic agents. For example, phthalic acid, isophthalic acid, terephthalic acid, and dimethylterephthalate have very broad applications in the further preparation of phthalate ester plasticizers and components of polyester fiber, film and fabricated items. ...

Compared with benzene and toluene, very much less is known of the human health hazards, particularly the chronic effects of xylenes, either as mixed xylenes, as individual isomers or in admixture with other alkylbenzenes.

[Fishbein L; Sci Total Environ 43 (1-2): 165-83 (1985)] \*\*PEER REVIEWED\*\*

... Xylene produced from petroleum ... contains approx 20% o-xylene, 44% m-xylene, 20% p-xylene and 15% ethylbenzene. Xylene from coal tar generally consists of 10-15% ortho-, 45-70% meta-, 23% para-, and 6-10% ethylbenzene.

[NIOSH; Criteria Document: Xylene p.14 (1975) DHEW Pub. NIOSH 75-168] \*\*PEER REVIEWED\*\*

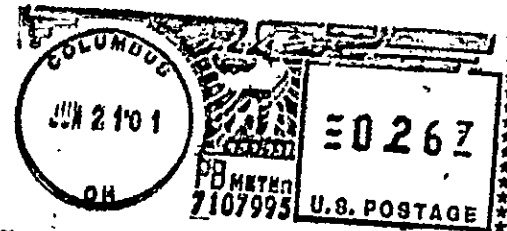
*polling  
diethyl...?  
dimethyl...?  
K.C. Cushman  
DHM-21.2  
7/25/01*



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Division of Ashland Inc.

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