



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

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

DEC 17 2002

Mr. Mike Stocker
LEGRA Engineering, Inc.
5433 Eagle Industrial Court
Hazelwood, MO 63042

Ref. No. 02-0197

Dear Mr. Stocker:

This responds to your letter, on behalf of Michael Martin with Pacific Rim Polymers PTY LTD - Australia, regarding confirmation of your understanding that a material described as "Aerosols, 2.2, UN1950" containing "Castor" (packaged in 50 mL to 1000 mL metal cans) is not a hazardous material for purposes of transportation. A Material Safety Data Sheet (MSDS) was enclosed. We apologize for the delay in responding and hope it has not caused any inconvenience.

Your understanding is incorrect. The aerosol described in your letter is subject to the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). As described in your MSDS, "Aerosols, 2.2, UN1950" is specifically listed by name and designated as a hazardous material in the § 172.101 Hazardous Materials Table (§ 172.101 HMT). Therefore, for purposes of transportation, "Aerosols, 2.2, UN1950" must be packaged, marked, labeled and described on shipping papers as specified in the HMR. Packagings authorized for this material are found in §§ 173.306 and 173.307.

I hope this satisfies your inquiry. If we can be of further assistance, please contact us

Sincerely,

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



020197

172.101

LEGRA

ENGINEERING, INC.

"DEWATERING PUMP SPECIALISTS"

Engram
872.101

Applicability
02-0197

MANUFACTURERS OF
BLASTHOLE DEWATERING PUMPS
HIGHWALL PUMPS
PONTOON, SKID & TRAILER
MOUNTED PUMPS

LEGRA ENGINEERING, INC.
5433 Eagle Industrial Court
Hazelwood, MO 63042
PHONE (314) 731 4573
FAX (314) 731 3399

Head Office: Po Box 3177 Nth Mackay, Qld. Australia 4741
International Phone No: (61-74) 942 3922; Fax: (61-74) 942 3868

Date: 7/19/02

Our Ref: No: 099/02

Edward Mazzullo
Director of Office of Hazardous Materials
Department of Transportation RSPA DHM-10 standards
400 7th street Southwest
Washington, D.C. 20590-0001

Dear Sir,

I am writing this letter on behalf of Michael Martin, with Pacific Rim Polymers PTY LTD - Australia. With this letter is a Materials Safety Data Sheet for a product desired to be brought in and distributed throughout the United States. If possible, he would like written confirmation that the products and materials would not be considered as hazardous materials for shipping purposes.

If there is any additional information I may provide, please do not hesitate to contact me: At the USA address or phone numbers above. Thank you for your time and assistance.

Regards,

Mike Stocker
Legra Engineering, Inc. USA

MATERIALS SAFETY DATA SHEET

Pacific Rim Polymers Pty Ltd.

A.C.N. 055 534 908

A.B.N. 67 055 534 908

12 Archimedes Street

Darra 4076

Brisbane Australia

Telephone Number: 61 7 3375 1034

Facsimile Number: 61 7 3375 1039

Emergency Number: 61 7 3375 1034

Issued: June 2002

Supersedes May 2001

"Not Hazardous According to criteria of Worksafe Australia"

IDENTIFICATION

Product Name: Castor.
Other Name: Aerosols.
Product Code: None.
Worksafe Hazard Assessment: Non hazardous according to criteria of Worksafe Australia.
UN Number: 1950.
Dangerous Goods Class: Class 2.2. Non flammable, non toxic gas.
Hazchem Code: None allocated.
Poisons Schedule: Not scheduled.
Use: Aerosol inflates multilayer bag for below ground decking.

PHYSICAL DESCRIPTION/PROPERTIES

Appearance: Clear liquid spray. (Packed in aerosol can with over cap).
Boiling/Melting Point: Not determined.
Vapour pressure: Complies with AS2278-2000
see ANSTO 'Certificate of Conformity No.1012'
(page4)
Specific Gravity: 0.86 - 0.9 @ 20°C
Flashpoint: Not determined.
Flammability Limits: Non Flammable in accordance with the Australian Dangerous Goods Code. However, inflated bags contain flammable vapour with limits of (%) 3.4 LEL to 18.0 UEL
Solubility in Water: Soluble in water.

OTHER PROPERTIES/INGREDIENTS

Chemical Name	CAS Number	Proportion
Hydrocarbon Propellant	115-10-6	20-40%
Other Ingredients	Not determined	80-60%

MATERIALS SAFETY DATA SHEET

Product Name: Castor

HEALTH HAZARD INFORMATION

Acute Effects.

Swallowed: If swallowed could have intoxicating effect.
Eye: Vapour may cause irritation to the eyes.
Skin: Contact with the liquid may cause frostbite by rapid evaporation.
Inhaled: Contact with the liquid may cause frostbite by rapid evaporation.
High concentrations of vapour in the air will cause a deficiency in oxygen, and may lead to unconsciousness.
Inhalation of vapour may lead to coughing, shortness of breath, headache and drowsiness. These symptoms of CNS depression occur in high concentrations. Intentional misuse can be fatal.

Chronic Effects. Not determined.

First Aid

Swallowed: Drink quantity of water.
Eye: Flush continuously with plenty of clean water for 15 minutes.
Seek medical attention.
Skin: In case of frostbite, DO NOT remove clothing, rinse with plenty of water. Seek medical attention.
Inhalation: Remove affected person to the fresh air. If not breathing, give artificial respiration by mouth to mouth. Seek medical attention.

Advice to Doctor: Treat symptomatically. In cases of excessive skin contact, treat as frostbite.

Toxicity Data: Major ingredient - Has LC50 of 164,000ppm.

PRECAUTIONS FOR USE

Exposure Standards: Worksafe TWQA & STEL: None established
PEL (OSHA) & TLV (ACGIH): None established.
AEL (Dupont) & WEEL (AIHA): 1000ppm, 8 & 12 Hr TWA
Engineering Controls: Not available.
Personal Protection: Not required under normal conditions of use. Wear goggles and gloves if used in a confined space over a prolonged period.
Flammability: Not flammable in aerosol container, in accordance with Australian Dangerous Goods Code.
Inflated bag contains flammable vapour so keep away from heat or ignition sources.

MATERIALS SAFETY DATA SHEET

Product Name: Castor

SAFE HANDLING INFORMATION

Storage & Transport: UN1950 AEROSOLS CLASS 2.2 NON-FLAMMABLE NON-TOXIC GAS, however is still a pressure vessel.

Keep in a cool place out of the sun. Do not heat above 65°C.

Spills & Disposal: Do Not incinerate or puncture can, even when empty. Dispose of empty can, through normal waste disposal authority.

However, inflated bags should be punctured in a well ventilated area away from heat or ignition sources & disposed through normal waste disposal authority.

Fire/Explosion Hazard: Aerosol can is non-flammable. Inflated bags however contain flammable vapour.

Keep away from heat or ignition source.

Ruptured or heated container may become a projectile hazard over a limited distance up to 50 metres.

Hazardous decomposition products include carbon dioxide and carbon monoxide.

SAFETY PRECAUTIONS

Avoid breathing high concentrations of vapours and avoid liquid contact with skin or eyes. Use in well-ventilated area away from possible ignition sources.

Whilst the information contained in this document is based on data which, to the best of our knowledge, was accurate and reliable at the time of preparation, no responsibility can be accepted by us for errors and omissions. The provision of this information should not be construed as a recommendation to use any of our products in violation of any patent rights or in breach of any statute or regulation. Users are advised to make their own determination as to the suitability of this information in relation to their particular purposes and specific circumstances. Since the information contained in this document may be applied under conditions beyond our control, no responsibility can be accepted by us for any loss or damage caused by any person acting or refraining from action as a result of this information.

MSDS is issued in accordance with Worksafe Australia guidelines and the information must not be altered or deleted in any way. Pacific Rim Polymers Pty Ltd will issue new MSDS when there is a change in specifications and/or Worksafe Australia guidelines/regulations.

MATERIALS SAFETY DATA SHEET

Ansto

AUSTRALIAN NUCLEAR SCIENCE AND TECHNOLOGY ORGANISATION

QUALITY CONTROL UNIT

CERTIFICATE OF CONFORMITY

No.: 1012

1. Client: **Pacific Rim Polymers Pty Ltd**
2. Client Order No.: **00005281**
3. Description of items:
Castor Aerosols UN 1950 Class 2.2
Steel Aerosol Dispensers 50 mm diameter x 150 mm long
a) **5 samples of unfilled cans**
b) **3 samples of filled cans**
4. This is to certify that the above items were tested and have been found to conform to the requirements of:

Australian Standard AS 2278 – 2000 "Non – refillable metal aerosol dispensers of capacity 50 mL to 1000 mL inclusive"
Section 2. Clause 2.2 Hydraulic Test, Clause 2.3 Bursting test.
Section 3. Clause 3.4 Maximum Pressure.

The test results shown in "Test Report No. 9299" were issued on the 3 June, 2002 by this testing laboratory located at ANSTO, New Illawarra Rd, Lucas Heights, NSW 2234 Australia.
5. Variation to Standard: Nil

For and on behalf of Ansto Engineering Quality Control Unit

S. Sinclair

S. Sinclair
NATA Approved Signatory

B. Ducker

B. Ducker,
Manager, Quality Control Unit
Date: 3 June, 2002



Contact Point: Pacific Rim Polymers. Tel: 61 7 3375 1034
Mike Martin. Tel: 0408 398 510 - 61 408 398 510 International