



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

NOV 21 2003

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

Mr. Mark Walker  
Sr. Vice President  
Gulf Trading (Alabama), Inc.  
1100 Washington Ave., Suite 312  
Carnegie, PA 15106-3617

Reference No.: 03-0201

Dear Mr. Walker:

This is in response to your letter concerning the classification of Calcium Silicide under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). You submitted test data based on the classification criteria in the UN Manual of Tests and Criteria which indicates your material contains 27.07% Calcium and 55.75% Silicon. It is your opinion that the material does not meet the definition of a Division 4.3 Dangerous when wet material.

Under § 173.22, it is the shipper's responsibility to classify a hazardous material. This office does not normally perform this function. However, based on the test data you submitted, it is the opinion of this office that your material does not meet the definition of a Division 4.3 material and provided it does not meet any other hazard class, it is not subject to the HMR.

I hope this satisfies your inquiry.

Sincerely,

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



030201

17322

July 29, 2003

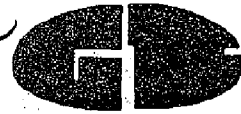
*Interpretation*

*Corbin*

*§ 173.124*

*Classification*

*03-0201*



**GULF TRADING**

Mr. Delmer Billings  
Chief Regulations Development  
Office of Hazardous Materials Standards  
400 Seventh St. S.W.  
Washington, DC 20590

GULF TRADING  
(ALABAMA), INC.  
Pittsburgh Office  
1100 Washington Ave.  
Suite 312  
Carnegie, PA 15106-3617  
Phone (412) 276-6311  
Fax (412) 276-6323  
E mail: gulfpitt@bellatlantic.net

Dear Mr. Billings,

Gulf Trading (Alabama) has tested our Calcium Silicide at the laboratories of Andrew S. McCreath and Son, Inc. and we submit the test results for your review. It is our contention that our calcium silicide does not meet the criteria of a division 4.3 material under HMR: 49 CFR Parts 171-180. McCreath tested the material in accordance with the method described in Appendix E part 173 and their results are attached to this letter.

We request that the department issue an exemption for our Calcium silicide.

Thanking you in advance, I remain

Sincerely yours,

Mark Walker  
Sr. Vice President

HAZMAT SAFETY  
DOT/RSP/PA  
03 AUG 11 PM 3:20



# Andrew S. McCreath & Son, Inc.

ANALYTICAL AND CONSULTING CHEMISTS

610 Willow Street  
 P.O. Box 1453  
 Harrisburg, PA 17105-1453  
 Telephone: (717) 238-9331  
 Telex: 84-2321  
 Fax: (717) 238-4843

July 29, 2003

Gulf Trading (Alabama), Inc.  
 1100 Washington Avenue - Suite 312  
 Carnegie, Pennsylvania 15106-3617

Gentlemen:

The sample received from you on July 24, 2003, identified as: Calcium Silicide, produced by China National Nonferrous Metals I/E Corp., Jiangsu Branch, was tested in accordance with DOT Standard 173, Appendix E, Division 4.3 (Dangerous when wet material). Results are as follows:

### Spontaneous Ignition Test

Division 4.3 a (1)	No Spontaneous Ignition
Division 4.3 a (2)	No Spontaneous Ignition
Division 4.3 a (3)	No Spontaneous Ignition

### Gas Evolution Measurement

Total volume in MI each hour.

<u>Time Interval</u>	<u>Test 1</u>	<u>Test 2</u>
1 Hour	1.00 MI	1.50 MI
2 Hour	1.00 MI	1.50 MI
3 Hour	1.00 MI	1.50 MI
4 Hour	1.00 MI	1.50 MI
5 Hour	1.00 MI	1.50 MI
6 Hour	1.00 MI	1.50 MI
7 Hour	1.00 MI	1.50 MI
Total	1.00 MI	1.50 MI

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July 29, 2003  
DOT Test  
Calcium Silicide

Maximum Rate - 0.060 liter/hour/kilogram

Average Rate - 0.007 liter/hour/kilogram

Yours very truly,

**ANDREW S. McCREATH & SON, INC.**

A rectangular stamp containing a handwritten signature in cursive script, which appears to read "George W. McCreath". The signature is written in dark ink on a light background.