



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

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

NOV - 4 2003

Ms. Kathryn F. Strang, CHMM
Manager, Regulatory & Environmental Affairs
Quaker Chemical Corporation
One Quaker Park
901 Hector Street
Conshohocken, PA 19428-0809

Ref. No. 03-0243

Dear Ms. Strang:

This responds to your September 29, 2003, letter requesting clarification on the proper classification of a liquid containing water and sodium nitrite, as well as several other non-hazardous materials under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask whether you should classify the material as "Oxidizing Liquid, n.o.s., 5.1" or as an "Environmentally Hazardous Substance, Liquid, n.o.s., 9".

Section 173.22 requires the shipper to properly class and describe the hazardous material in accordance with the HMR. This Office does not perform that function. If the sodium nitrite mixture you describe meets the defining criteria in Part 173 for a Division 5.1 Oxidizer, you may describe the material as "Sodium nitrite solution, UN 1500, PG III" or "Oxidizing liquid, n.o.s.(sodium nitrite), 5.1, UN 3139, PG I, II, or III, "as appropriate." In addition, sodium nitrite is listed as a hazardous substance in Appendix A to § 172.101, List of Environmentally Hazardous Substances and Reportable Quantities, with a reportable quantity of 100 pounds. If the quantity of material being transported in one package meets or exceeds the reportable quantity for sodium nitrite, the letters "RQ" must be included either before or after the basic description.

I hope this answers your inquiry.

Sincerely,

Susan Gorsky
Senior Transportation Regulations Specialist
Office of Hazardous Materials Standards



030243

172.101



Boothe
§ 172.101
Proper Shipping Name
03-0243

September 29, 2003

Mr. Ed Mazullo
U.S. Department of Transportation
Research & Special Programs Administration
Office of Hazardous Materials Standards
400 Seventh Street, SW
Washington, DC 20590

Dear Mr. Mazullo:

We are requesting a clarification of classification for an liquid that contains water, sodium nitrite as well as several other NonHazardous materials. Using 172.101, we are unsure whether to classify the material as "Oxidizing Liquid, n.o.s., 5.1" or as an "Environmentally Hazardous Substances, Liquid, , n.o.s., 9".

Any assistance that you can provide would be greatly appreciated.

Sincerely,

Kathryn F. Strang, CHMM
Manager, Regulatory &
Environmental Affairs

Quaker Chemical Corporation

One Quaker Park, 901 Hector Street, Conshohocken, PA 19428-0809 USA www.quakerchem.com

T 610.832.4000 F 610.832.8682