



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

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

APR 5 2004

Mr. John Rhodes
W. M. Barr & Co.
2105 Channel Avenue
Memphis, TN 38101

Reference No.: 04-0046

Dear Mr. Rhodes:

This responds to your letter concerning the proper shipping name for "removing compound" under the Hazardous Materials Regulations (HMR; 49 CFR parts 171-180). You state that the compound contains methylene chloride (dichloromethane), methanol, ammonium hydroxide solution and other non-hazardous material. A dermal corrosivity test found the material to be dermal corrosive in Packing Group II. You ask whether "Paint related material, UN 3066" is the correct name to describe your material.

The answer is yes. It is the opinion of this office that "Paint related material, 8, UN 3066, PG II" is the proper shipping description for your material. Section 173.173 identifies "Paint related material" as the proper shipping name for a paint thinning, drying, reducing or removing compound. However, if a more specific description is listed in the § 172.101 Hazardous Materials Table, that description must be used.

I hopes this satisfies your request.

Sincerely,

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



040046

§ 172.101

INFOCNTR

From: john_rhodes@wmbarr.com
Sent: Wednesday, March 10, 2004 10:42 AM
To: INFOCNTR
Subject: Information Center Comments/Questions

Corbin
§172.101
Proper Shipping Name
04-0046

Below is the result of your feedback form. It was submitted by John Rhodes (john_rhodes@wmbarr.com) on Wednesday, March 10, 2004 at 10:41:59.

Email: john_rhodes@wmbarr.com

Name: John Rhodes

Category: Hazardous Materials Table, Special Provisions, Hazardous Materials Communications

Organization: W.M. Barr & Co.

Street: 2105 Channel Ave. (P.O. Box 1879)

City: Memphis

State: Tennessee

Zip Code: 38101

Phone: 901-775-5447

Fax: 901-775-5467

Comments: My company, W.M. Barr & Co., ships, domestically, a paint remover as a "Paint related material, UN3066". This formula contains Methylene Chloride (dichloromethane), methanol, ammonium hydroxide solution and other materials not considered hazardous. Because of what the product is used for, removing paint and "removing compound" is referenced under "paint related material" in 49 CFR 172.101, that this is a proper shipping name for this product. We had TOX MONITOR do a dermal corrosivity test for us and found it to be a PGII dermal corrosive, thus the UN3066. I would like a formal response, based on the information provided to you, that "Paint Related Material, UN3066" is or is not a proper shipping name for this product. You may contact me at 901-775-5447 or email: john_rhodes@wmbarr.com or P.O. Box 1879, Memphis, TN 38101.

Sincerely,
John Rhodes
W.M. Barr & Co.