



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

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

FEB 11 2005

Mr. Jim McDaniel  
Gabriel Chemicals, L.L.C.  
1150 Bank One Centre, North Tower  
450 Laurel Street  
Baton Rouge, LA 70801

Ref. No.: 05-0027

Dear Mr. McDaniel:

This is in response to your February 3, 2005 letter and telephone conversation with Arthur Pollack of my staff requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically you ask if, when the requirements in § 174.63 are met, chlorosulfonic acid may be transported by rail in an IM portable tank.

The answer is yes. However, portable tanks, IM portable tanks, IBCs, cargo tanks, and multi-unit tank car tanks may not be transported in container-on-flatcar (COFC) or trailer-on-flatcar (TOFC) service except when transported in accordance with § 174.63 or unless approved for transportation by the Associate Administrator for Safety, Federal Rail Administration (FRA). Chlorosulfonic acid may not be transported in accordance with § 174.63(c) and therefore, must be transported under paragraph (b) or approved by the Associate Administrator for Safety, FRA.

I hope this information is helpful. If you have further questions, please do not hesitate to contact this office.

Sincerely,

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



050027

174.63



*Gabriel Chemicals*

Pollack  
§174.63  
Rail  
05-0027

February 3, 2005

Mr. Edward T Mazzullo DOHMS  
USDOT/RISPA (DHMIO)  
400 Fourth Street S.W.  
Washington DC 20590

This letter is to request confirmation that DOT Regulation 49CFR174.63 does permit the movement of Chlorosulfonic Acid in intermodal bulk containers by rail when all the requirements of this regulation are met.

Respectfully

Jim McDaniel

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