



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

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

MAY 6 2005

Ms. Dianna F. Lee
Mallinckrodt Baker, Inc.
600 N. Broad Street
Phillipsburg, NJ 08865

Ref. No. 05-0062

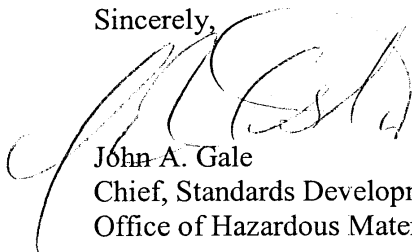
Dear Ms. Lee:

This responds to your November 3, 2004 letter and March 18, 2005 fax requesting clarification on the labeling requirements for 'Methanol' when shipped domestically and internationally under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask whether it is permissible to label the package in compliance with international requirements when shipped domestically only.

The answer is yes. As your letter notes, the Hazardous Materials Table (HMT) includes two entries for methanol, one for international transportation and one for domestic transportation. The two entries are identical, except that the international entry requires a subsidiary hazard Division 6.1 label, and the domestic entry does not. In accordance with § 172.101(b)(3) and (b)(5), you may use either the international or domestic entry in the HMT for domestic transportation of methanol.

I hope this answers your inquiry.

Sincerely,



John A. Gale
Chief, Standards Development
Office of Hazardous Materials Standards



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172.101
172.419

tyco

Specialty Products

Mallinckrodt Baker

Boothe
§ 172.101
§ 172.419

Mallinckrodt Baker, Inc.
222 Red School Lane
Phillipsburg, NJ 08865

Tel: 908-859-2151
Fax: 908-859-9411

Labeling
09-0062

Mr. Edward T. Mazzullo
Director, Office of Hazardous Materials Standards
U.S. DOT/PHMSA (DHM-10)
400 7th Street S.W.
Washington, D.C. 20590-0001

November 3, 2004

Dear Mr. Mazzullo,

This letter is a request for a letter of interpretation regarding a hazardous material, methanol.

To give you a brief overview of the situation, our company sells methanol as a product, and traditionally have been packaging and labeling them separately for domestic and international shipments. We are currently assessing the possibility of consolidating the two and just use the international classification, and affixing both the flammable and toxic labels to both domestically and internationally shipped packages.

The current 49 CFR specifies in the Hazardous Materials Table (172.101) that for Methanol, UN1230, PGII, there exists two entries, namely one for domestic (denoted by a letter "D") and one for international (denoted by a letter "I") shipping purposes. The two entries are identical except for the labeling codes required. International shipping requires both a flammable label (3) and a toxic label (6.1) in order to meet the requirements for hazard classes. Domestic shipping, however, only requires the flammable label (3), and there is no mention of toxicity hazards associated with the chemical. According to section 172.101(b)(5), "The letter "I" identifies proper shipping names which are appropriate for describing materials in international transportation. An alternate proper shipping name may be selected when only domestic transportation is involved." My interpretation of this is that although we may choose to use the domestic classification with only the flammable label and hazard class 3 requirement for methanol, we will not be out of compliance if we choose to disclose the toxicity hazard and classify our product (methanol) as class 3, with a subsidiary hazard class of 6.1, which requires both the flammable and toxic labels for domestic shipping only purposes.

I would appreciate it if you can please reply back with an official interpretation from the hazmat administration regarding this issue: as to whether or not we would be incorrect and out of compliance to affix both flammable(3) and toxic(6.1) labels on a package of methanol shipped domestically only. The response can be forwarded to the below address, and should you have any questions, please feel free contact me at the number also provided below.

Mallinckrodt Baker, Inc.
600 N. Broad Street
Phillipsburg, NJ 08865
(908)859-2151 ext. 9764

Once again, thank you in advance for your help and clarification in this matter, and I look forward to hearing from you.

Sincerely,

A handwritten signature in black ink, appearing to read "Dianna F. Lee". The signature is fluid and cursive, with the first name "Dianna" written in a larger, more prominent script than the last name "Lee".

Dianna F. Lee
Quality Information Administrator