



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety Administration**

1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

MAY 23 2008

Mr. Paul R. Hattingh
Anodamine, Inc.
2590 Oakmont Drive, Suite 310
Round Rock, TX 78665

Ref. No.: 08-0103

Dear Mr. Hattingh:

This is in response to your April 14, 2008 letter regarding the applicability of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) to cyclohexylamine in concentrations of 13-15 percent.

It is the shipper's responsibility to properly class and describe a hazardous material. This Office does not perform that function. The definitions for flammable liquid and corrosive liquid are found in §§ 173.120 and 173.136 respectively. If you determine that your concentration does not meet either hazard class, and presuming the solution does not meet any other hazard class under the HMR, the material would not be regulated. In response to your second question, if the material meets the definitions of a flammable liquid and a corrosive liquid, and is a packing group II, then the entry "Cyclohexylamine, 8, (3), UN2357, PGII" is an appropriate description.

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

USDOT-PHMSA

PHH-10 East Building 2nd floor
1200 New Jersey Ave.
South East Washington DC 20590
Monday, April 14, 2008

Pollack
\$172.101

Proper Shipping Name
08-0103

To whom it may concern

Hazmat Classification

We recently placed a call to your offices and spoke with a very helpful person regarding classification of our proprietary formulations used as metal corrosion inhibitors in water steam and condensate cycles.

The **anodamine™** proprietary formulations contain several trace concentrations of known non-toxic, non-hazardous raw material components, blended in to the final water mixture to produce the final formulations. The main ingredient however, requiring clarification and/or classification is **cyclohexylamine**. The individual formulations across the range contain varying concentrations of **cyclohexylamine diluted in a high purity water solution to yield a final concentration maximum of 13 - 15 % active as typical.**

I would like to kindly request your support with obtaining an official written response to enable us to ensure compliance - **does a 13 - 15 % diluted solution of cyclohexylamine in 85 - 87 % high purity water carry HAZMAT classification** and if so what would be the required packing group, UN No, Description, Class etc?

If the material and final formulations having the above composition would non be subject to DOT regulation, please kindly send an official letter to our offices to verify this.

All formulations are packaged in 15 gal, 55 gal and 264 gal UN approved containers.

I look forward to your soonest response and thank you and your office for your kind support.

Best Regards



Paul R. Hattingh

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