



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

MAY 13 2008

1200 New Jersey Avenue, SE
Washington, D.C. 20590

Mr. A.B. Eargood
Brenntag Mid-South, Inc.
P.O. Box 20
Henderson, KY 42420

Reference No. 08-0108

Dear Mr. Eargood:

This is response to your April 11, 2008 letter concerning the Hazardous Materials Table (§ 172.101) entry for “UN 1791, Hypochlorite solutions, 8 (corrosive), PG II” in the October 1, 2007 edition of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). You asked if the “PG III” designation present in earlier editions of the HMR had been inadvertently deleted.

The answer is yes. The PG III entry for the proper shipping name hypochlorite solutions was inadvertently removed when this entry was revised in a December 29, 2006 final rulemaking published under Docket No. PHMSA-06-25476 (HM-215I; 71 FR 78596, 78622). This error will be corrected in a future rulemaking. In the interim, the PG III entry may continue to be used for hypochlorite solutions that meet the defining criteria for a PG III Class 8 liquid prescribed in § 173.137.

Thank you for bringing this matter to our attention. I hope this information is helpful.

Sincerely,

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

BRENNTAG

Brenntag Mid-South, Inc.

Edmonson
§172.101
Applicability
08-0108

ASSOCIATE ADMINSTRATOR FOR HAZARDOUS MATERIALS
SAFETY, RESEARCH AND SPECIAL PROGRAMS ADMINSTRATION

DEAR SIR,

THERE IS A TYPO IN 49CFR172.101 REGARDING HYPOCHLORITE SOLUTIONS, PG 111. IF YOU LOOK ON-LINE AT THE REVISION DATE 10-01-07, YOU WILL SEE THAT THE PG 111 LISTING HAS BEEN INADVERTENTLY DELETED.

MAY I HAVE A LETTER FROM YOUR OFFICE STATING THAT THIS IS CORRECT SO THAT WE ARE QUESTIONED DURING DOT DRIVER STOPS OR A INSPECTION AT ONE OF OUR FACILITIES WE WILL HAVE ON FILE THIS INFORMATION.

IF POSSIBLE I NEED A COPY FAXED TO MY ATTENTION AT 270-830-1396.

SINCERELY,



A B EARGOOD

04/11/08

A B EARGOOD
BRENNTAG MID-SOUTH, INC.
P O BOX 20
HENDERSON, KY 42420
beargood@brenntag.com
Phone 270-830-1318
Fax 270-830-1396

Brenntag Mid-South, Inc.
1405 Highway 136 West
P.O. Box 20
Henderson, KY 42419-0020