



U.S. Department  
of Transportation

Pipeline and Hazardous Materials  
Safety Administration

1200 New Jersey Ave., SE  
Washington, DC 20590

OCT 07 2009

Mr. Chris W. Gibson  
EHS&R Manager  
Hawkins, Inc.  
3100 East Hennepin Avenue  
Minneapolis, MN 55413

Ref. No.: 08-0216

Dear Mr. Gibson:

This responds to your letter dated August 20, 2008, regarding the segregation requirements of the Hazardous Materials Regulations (HMR: 49 CFR Parts 171-180). Specifically, you ask if § 177.848(c) applies to the transport of "Hydrochloric Acid, 8, UN 1789, PG II", and an unregulated material (i.e., Ferric Ferro cyanide) that can produce hydrogen cyanide when it comes into contact with acids.

Paragraph (c) of § 177.848 prohibits cyanides and cyanide mixtures or solutions to be stored, loaded or transported in the same transport vehicle with "acids" if a mixture of the materials would generate hydrogen cyanide. Further, Division 4.2 materials may not be stored, loaded and transported with Class 8 (Corrosive) liquids. This requirement does not address cyanides and cyanide mixtures or solutions transported on the same transport vehicle with unregulated materials. However, § 173.21(e) of the HMR prohibits a material in the same packaging, freight container, or overpack with another material, the mixing of which is likely to cause a dangerous evolution of heat, or flammable or poisonous gases or vapors or to produce corrosive materials. Therefore, the transport of "Hydrochloric Acid, 8, UN 1789, PG II" and an unregulated material (i.e., Ferric Ferro cyanide) that can produce hydrogen cyanide gases or vapors when it comes into contact with acids is forbidden.

I hope this information is helpful. If we can be of further assistance, please contact us.

Sincerely,

Susan Gorsky  
Acting Chief, Standards Development  
Office of Hazardous Materials Standards



# HAWKINS, INC.

DOT/RSPA/OHMS  
UNIT

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Engram  
§ 177.848 (c)  
§ 173.12(e)  
Segregation  
08-0216

August 20, 2008

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

## REQUEST FOR INTERPRETATION

**RE: 49 CFR 177.848(c)**

Dear Mr. Mazzullo:

### Scenario:

There are 2 products to be shipped via truck (1 shipment)

Product #1 is a 500# drum of Hydrochloric Acid (UN1789, Hazard Class 8, PGII)

Product #2 is Manox Blue Dye 180D, which is a Non-DOT regulated material, which contains Ferric ferrocyanide (CAS#14038-43-8). The Material Safety Data Sheet for this product indicates that Hydrogen Cyanide gas can be evolved when it comes into contact with acids.

49 CFR 177.848(c) states: "In addition to the provisions of paragraph (d) of this section and except as provided in §173.12(e) of this subchapter, cyanides, cyanide mixtures or solutions may not be stored, loaded and transported with acids if a mixture of the materials would generate hydrogen cyanide, and Division 4.2 materials may not be stored, loaded and transported with Class 8 liquids."

As Product #1 is regulated, but Product #2 is not, does 177.848(c) apply?

If you have any questions, I can be reached at 612-331-6910, x8551 or at [chris.Gibson@hawkinsinc.com](mailto:chris.Gibson@hawkinsinc.com)

Sincerely,

Chris W. Gibson  
EHS&R Manager  
Hawkins, Inc.