



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

1200 New Jersey Avenue, SE
Washington, DC 20590

JAN - 5 2010

Mr. David A. Wright
Fire Extinguisher/ DOT Cylinder
Hydrotest Tech.
Building 1745 1st Avenue
NAS Corpus Christi, TX 78419

Ref. No.: 09-0223

Dear Mr. Wright:

This responds to your facsimile letter regarding the correct identification number under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) for a shipment of fully charged "Amerex Model 600, Halon 1211 Flightline Wheel Units" from NAS in Corpus Christi, Texas to JRB in Fort Worth, Texas.

According to your letter, "Flightline Wheel Units" are DOT 4BW240 specification cylinders, maintained by your organization, and placarded with the identification number "UN1956" (containing Halon 1211 + N2). The MSDS uses the identification number "UN1974." You ask for guidance in determining the correct identification number to use to ship these cylinders.

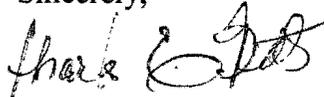
You did not provide sufficient information (e.g., hazard characteristics, MSDS, etc.) on your product to enable us to make a determination regarding classification. Under 49 CFR 173.22, it is the shipper's responsibility to properly classify a hazardous material. This office does not perform that function. Under the HMR, the UN numbers "UN1956" and "UN1974" are the identification numbers for the descriptions "Compressed gas, n.o.s., 2.2", and "Chlorodifluorobromomethane, 2.2" *or* "Refrigerant gas, R 12B1", respectively.

The HMR specify requirements for classification, packaging, preparation of shipping papers, marking, labeling, placarding, emergency response information, and training. The definition and packaging requirements for compressed gases are found in 49 CFR 173.115 and 173.302,

respectively. A list of commercial suppliers of the HMR is enclosed. You may also access the HMR at www.gpoaccess.gov/ecfr.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Charles E. Betts". The signature is written in a cursive style with a large initial "C" and "B".

Charles E. Betts
Chief, Standards Development
Office of Hazardous Materials Standards

Enclosure

Drakeford, Carolyn (PHMSA)

From: Foster, Glenn (PHMSA)
Sent: Monday, September 28, 2009 3:20 PM
To: Drakeford, Carolyn (PHMSA)
Cc: Mitchell, Hattie (PHMSA)
Subject: FW: UN1974/UN1956

Engram
§ 172.101

Applicability
09-0223

-----Original Message-----

From: Cushmac, George (PHMSA)
Sent: Monday, September 28, 2009 11:40 AM
To: Foster, Glenn (PHMSA)
Cc: Mitchell, Hattie (PHMSA); 'david.a.wright2@navy.mil'
Subject: FW: UN1974/UN1956

Glenn,

Per our discussion, I am forwarding Mr. Wright's email message to you. This is an issue that should be resolved by the Office of Hazardous Materials Standards. Note that earlier today, Mr. Wright called the Information Center(?) and was transferred to me. Following my conversation with Mr. Wright, he sent an email message to me explaining his problem (see below).

Regards,

George

George E. Cushmac, Ph.D.
Office of Hazardous Materials Technology (PHH-20) Pipeline and Hazardous Materials Safety Administration U.S. Department of Transportation East Building, 2nd Floor (E21-221) 1200 New Jersey Avenue, S.E.
Washington, DC 20590-0001
Tel: 202-366-4493
Fax: 202-366-3753
email: george.cushmac@dot.gov

-----Original Message-----

From: Wright, David A CIV NAS CORPUS CHRISTI TX [mailto:david.a.wright2@navy.mil]
Sent: Monday, September 28, 2009 10:43 AM
To: Cushmac, George (PHMSA)
Subject: UN1974/UN1956

George,

I am attempting to ship fully charged Amerex Model 600, Halon 1211 Flightline Wheel Units from here to JRB Fort Worth. These wheel units are DOT 4BW240 spec. cylinders. I have held maintenance on these units and as per regs. have placarded them as UN1956 (Halon 1211 + N2). All of the MSDS's that have been found use UN1974 in section 14 of the sheet which is the Transport Information Section. Supply Department will not ship because of the difference in UN numbers. Can you please give me specific guidance? It seems to me that sense BOTH are division 2.2 gases they could be shipped under the division code.

V/R

David A. Wright
Fire Extinguisher/DOT Cylinder Hydrotest Tech.
BLDG. 1745 1st Ave.
NAS Corpus Christi, Tx 78419
(361) 961-2870
DSN: 861-2870

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