



U.S. Department
of Transportation

1200 New Jersey Avenue SE
Washington, DC 20590

**Pipeline and Hazardous
Materials Safety
Administration**

JUL 26 2012

Dr. Marc A. Feldman, CMQ/OE
Regulatory Affairs Manager
Solvay Chemicals, Inc.
3333 Richmond Avenue
Houston, TX 77227-7328

Ref. No.: 12-0149

Dear Dr. Feldman:

This is in response to your July 9, 2012 letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) and the term "key words" as used in § 172.330(a)(1)(ii). You state that your company ships "UN2014, Hydrogen peroxide, aqueous solutions, greater than 20% hydrogen peroxide," and "UN2015, Hydrogen peroxide, stabilized," in tank cars. In accordance with § 172.330(a)(1)(ii), a tank car containing either of these materials is required to be marked on each side with the key words of the proper shipping name specified for the material in the §172.101 table. Specifically, you ask if marking the tank cars on each side with the words "Hydrogen peroxide" would meet the requirements of § 172.330(a)(1)(ii).

The answer is yes. Provided the tank car is marked on each side and each end as required by §172.302 with the identification number specified for the material in the §172.101 table, marking the tanks cars on each side with the key words "Hydrogen peroxide" is consistent with the requirements of § 172.330(a)(1)(ii). To acknowledge shippers' concerns with respect to marking long proper shipping names on tank cars, the HMR authorize the use of concise markings, provided they accurately communicate the hazard of the material. A concise marking includes the key words from the proper shipping name. The use of key words in conjunction with the identification number marking and shipping paper description provides an emergency responder with sufficient information to proceed with an accurate course of action.

I hope this information is helpful. If you have further questions, please do not hesitate to contact this office.

Sincerely,

Robert Benedict
Chief, Standards Development
Standards and Rulemaking Division



Winter
§172.101
§172.330
Marking
12-0149

July 9, 2012

Standards and Rulemaking Division
Pipeline and Hazardous Materials Safety Administration
Attn: PHH-10
U.S. Department of Transportation
East Building
1200 New Jersey Avenue SE.
Washington, DC 20590-001

Dear Sir:

Section 172.330 of the Hazardous Material Regulations (49 CFR 105-180) requires "A tank car containing any of [several] materials must be marked on each side with the key words of the proper shipping name specified for the material in the §172.101 Table, or with a common name authorized for the material in the subchapter (e.g., "Refrigerant Gas")".

Our company ships hydrogen peroxide (both UN2014 and UN2015) in rail cars. These railcars may be used interchangeably for either product at various times but are suitably placarded and referenced in the shipping papers depending on which is contained in the railcar.

For purposes of this marking, would marking the words 'Hydrogen Peroxide' be viewed as an acceptable representation of the keys words of the proper shipping names and/or a common name for both the UN 2014 and UN2015 hydrogen peroxide entries?"

Sincerely,

Dr. Marc A. Feldman, CMQ/OE
Regulatory Affairs Manager
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