



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

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

AUG 22 2012

Mr. Gil Walton
Sr. Trade Analyst
Kiddie Fenwal Inc.
400 Main Street
Ashland, MA 01721

Ref. No. 12-0162

Dear Mr. Walton:

This responds to your August 1, 2012 letter regarding determination of the proper shipping name for your product under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). In your incoming letter, you describe a 4BW steel cylinder containing a mixture of Heptafluoropropane (95-98%) a fire extinguishing agent, and nitrogen (2-5%) an expellant. Specifically, you ask if the concentration of 95-98% Heptafluoropropane would be considered technically pure, and therefore, be classified under the proper shipping name, "Heptafluoropropane, UN 3296, 2.2", as listed in the Hazardous Materials Table (HMT) in 172.101.

Section 173.22 states that it is the shipper's responsibility to properly classify a hazardous material. This office does not perform that function. However, upon review of the information you supplied, it is the opinion of this office, that the most appropriate proper shipping description for the fire extinguishing system you described is "Fire extinguishers containing compressed or liquefied gas, UN 1044, 2.2."

I hope this answers your inquiry. If you need additional assistance, please contact this office at (202) 366-8553.

Sincerely,

Robert Benedict
Chief, Standards Development Branch
Standards and Rulemaking Division



A UTC Fire & Security Company

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Fax: 508.881.8920
www.kidde-fenwal.com

Booth
§172.101
Shipping Name
12-0162

Dear Mr. Betts,

I am requesting a ruling on behalf of Kidde Fenwal Inc. regarding the UN number and proper shipping name for 4BW steel cylinders containing Heptafluoropropane and charged with nitrogen. These cylinders are part of a fixed fire suppression system. The concentrations by weight are as follows:

Heptafluoropropane – 95-98% and Nitrogen 2-5%

Heptafluoropropane is a fire extinguishing agent and the nitrogen is added to super pressurize the assembly and act as the expellant gas during discharge. The purpose of the nitrogen is to enable a rapid discharge of the Heptafluoropropane to suppress the fire.

According to 172.101(c) 10 B the shipping description indicates that the proper shipping name applies only to the pure or technically pure hazardous material. Since Heptafluoropropane is the predominant hazard, it is called out by name in the Hazardous Materials Table, and is technically a pure substance due to concentration, would the UN number and proper shipping name be UN3296 and Heptafluoropropane?

I appreciate your consideration in this matter.

Sincerely,
Gil Walton

Sr. Trade Analyst
Kidde Fenwal Inc.
508-231-2758