



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

400 Seventh Street, S.W.
Washington, D.C. 20590

SEP - 8 1999

Mr. Donald Hodder
Global HAZMAT Compliance Manager
Uniroyal Chemical Company, Inc.
Middlebury, CT 06749

Ref. No. 99-0219

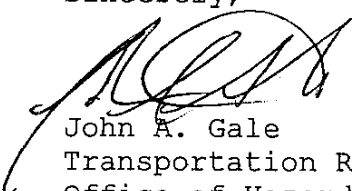
Dear Mr. Hodder:

This is in response to your letter dated July 30, 1999, regarding the selection of a proper shipping name under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). In your letter, you request clarification on the proper shipping name for a mixture containing various ranges of acetic acid. You stated the material is currently described as "Dyes, liquid, corrosive, n.o.s. (Acetic Acid);" however, you would like to use the proper shipping name "Acetic acid solution."

Under § 173.22, it is the shipper's responsibility to properly class and describe the material. However, based on the information you provided, it is our determination that either proper shipping name would be correct for the mixture.

I hope this satisfies your request.

Sincerely,


John A. Gale
Transportation Regulations Specialist
Office of Hazardous Materials Standards



990219

172.101
173.22

**UNIROYAL
CHEMICAL**

Uniroyal Chemical Company, Inc.
World Headquarters
Middlebury, CT 06749
(203) 573-3702

July 30, 1999

BH11
§ 173.22
99-0219

Mr. Edward Mazzullo
U.S. Department of Transportation
Hazardous Materials Standards
400 Seventh Street S.W.
Washington, DC 20590

Subject: Selection of a Proper Shipping Name for a Mixture and Solution

Dear Mr. Mazzullo:

Our company is having a disagreement on the selection of a "Proper Shipping Name" for several of our products. The products contain Acetic Acid in various percentage ranges. Based on the information in § 172.101(c)(10)(i)(F) the material is currently called "**Dyes, liquid, corrosive, n.o.s. (Acetic acid)**".

The above section starts as follows:

"A mixture or solution not identified specifically by name"

Because of this wording, I feel that the Proper Shipping Name should be "**Acetic acid solution**" which is specifically identified by name in the Hazardous Materials Table.

Please review the above information and advise the correct interpretation of this section so that we show the correct Proper Shipping Name for this product line. Your assistance in this matter is appreciated. If you need any additional information you can contact me at 203-573-3702.

Sincerely;



Donald Hodder
Global HAZMAT Compliance Manager

cc: Janice Warnquist

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10/1/99