



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

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

MAR 26 2007

Mr. Paul J. Crook
Safety & Environmental Manager
Fluoro-Seal International
16360 Park Ten Place, Suite 325
Houston, Texas 77084

Ref. No. 07-0047

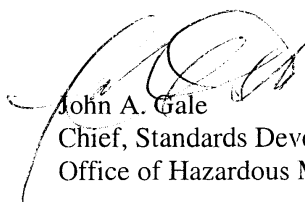
Dear Mr. Crook:

This responds to your February 20, 2007 letter requesting clarification on Special Provision 3 in §172.102 of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask whether the appropriate hazard zone for "Hydrogen fluoride, anhydrous, UN 1052", is Hazard Zone B or Hazard Zone C.

As your letter indicates, the entry for "hydrogen fluoride, anhydrous, UN 1052" is assigned "Special Provision 3" in column 7 of the Hazardous Materials Table (HMT) in §172.101 of the HMR. Special Provision 3 indicates that the material is poisonous by inhalation in Hazard Zone C. Special Provision 3 also references §173.116(a) – Class 2, Assignment of Hazard Zone. Section 173.116(a) states that the hazard zone for a Division 2.3 material is assigned in Column 7 of the §172.101 table. The criteria specified in §173.116(a) for assignment of hazard zones are to be used when the §172.101 table provides more than one hazard zone for a Division 2.3 material, or indicates that the hazard zone must be determined on the basis of the grouping criteria for Division 2.3. The hazard zone for hydrogen fluoride, anhydrous is assigned in Column 7 of the HMT; thus, Hazard Zone C is the correct hazard zone designation for this material.

I hope this answers you inquiry.

Sincerely,



John A. Gale
Chief, Standards Development
Office of Hazardous Materials Standards



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172.101
172.102 SP3
173.166(a)



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An ISO 9001 Certified Company

Boothe
§ 172.101
§ 172.133
Applicability
07-0047

Tuesday, February 20, 2007
Edward Muzzullo,
Office of Hazmat Standards
US DOT/PHMSA-DHM10
400 7th St. SW
Washington, D.C. 20590

Subject: Letter of interpretation request for shipping Hydrogen Fluoride

Dear Mr. Muzzullo,

I am writing to get an official letter of interpretation on shipping Hydrogen Fluoride (anhydrous).

According to 172.101, Hydrogen Fluoride (UN 1052) is packing group 1. 173.133, figure one shows that materials in packing group 1 can be either hazard zone A or hazard zone B.

The special provision 3 under column 7 of 172.101 refers to 172.102, special provision 3. This section states "This material is poisonous by inhalation in hazard zone C". This seems to contradict 173.133 figure one. This special provision also refers to 173.116(a) which is a table showing that Hydrogen Fluoride would be in Hazard Zone B.

Can you please clarify under which hazard zone hydrogen fluoride should be shipped.

Please feel free to contact me if you have any questions on any of the above, or if I can be of further assistance by phone at (281) 578 1440, fax at (281) 578 3159 or by email at pcrook@fsicorp.com

Sincerely,
FLUORO-SEAL INTERNATIONAL, L.P.

Paul J. Crook
Safety & Environmental Manager