



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

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

SEP 12 2006

Mr. Herb Debban
Director, Facilities and Operations Directorate
Oak Ridge National Laboratory
P.O. Box 2008
Oak Ridge, Tn 37831-6257

Reference No. 06-0168

Dear Mr. Debban:

This is in response to your June 26, 2006 letter concerning how to select the correct proper shipping name for a lab pack containing two types of Division 4.1 (flammable solid) materials under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). In your example, you state the outer package contains five bottles, three that contain organic compounds and two that contain inorganic metal powders. Because there is no generic flammable solid proper shipping name without the word "organic" or "inorganic" on the Hazardous Materials Table (HMT; § 172.101), you ask if you must choose one of these names to describe the lab pack or if a generic proper shipping name for each material must be used.

The lab pack exception in § 173.12(b) allows a shipper to use a generic proper shipping name in place of specific chemical names to represent two or more compatible waste materials of the same hazard class in the same outside packaging provided the items are packaged, described, and transported in accordance with this section. If an appropriate generic proper shipping name to describe all the materials within the package is not provided in the HMR, either the generic or specific proper shipping name for each material contained within the package may be used.

I hope this information is helpful.

Sincerely,

Hattie L. Mitchell, Chief
Regulatory Review and Reinvention
Office of Hazardous Materials Standards



060168

172.101
173.12 (b)

OAK RIDGE NATIONAL LABORATORY

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June 26, 2006

U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
400 Seventh Street, S.W.
Washington, DC 20590

Edmonson
§ 172.101 (b)
§ 173.12 (b)
Proper Shipping Name
06-0168

Dear Sir or Madam:

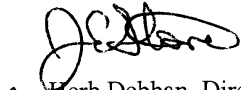
Our company has a need to prepare a lab pack of flammable solids with five inner bottles. Three contain organic compounds and two contain inorganic metal powders. The 1996 Department of Transportation (DOT) interpretation (96-1019) addresses mixtures (Question 1) and lab packs containing both organic and inorganic materials (Question 2). For lab packs, the interpretation advises use of a more generic Proper Shipping Name (PSN) that does not reflect "organic" or "inorganic." DOT cites "Corrosive liquid, n.o.s." as an example of this approach. However, all of the currently available generic flammable solid PSNs (except one with a 5.1 subsidiary hazard) have "organic" or "inorganic" as part of the entry. Would it be appropriate to select the generic PSN based on inner container quantities (i.e. mass, volume, or piece count) of organics vs. inorganics? Alternately, would it be necessary to use two PSNs for this lab pack?

Also, since the proper shipping names for Toxic liquids and Toxic solids also have only organic or inorganic n.o.s. options, could we follow the same rationale as mentioned above for flammable solids?

Your assistance in this matter is greatly appreciated.

If you have any questions please contact Jeff H. Shelton at (865) 576-6401.

Sincerely,



Herb Debban, Director
Facilities and Operations Directorate

HLD:bjc

cc: M. G. Branton, DOE-ORO
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J. E. Powell
J. B. Roberto
C. A. Schrof

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