



U.S. Department  
of Transportation

**Research and  
Special Programs  
Administration**

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

AUG 13 1998

Ms. Elaine Bradford  
Safety/Regulatory Affairs Director  
Spectra Gases, Inc.  
3434 Route 22 West  
Branchburg, NJ 08876

Ref. No. 98-0201

Dear Ms. Bradford:

This is in response to your letter dated July 20, 1998, requesting clarification on the proper classification of your gas mixtures under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, as stated in your letter, an overseas customer is requesting that you furnish documentation from this Department to confirm that Spectra Gases, Inc. has correctly classified the gas mixture in question.

Under 49 CFR 173.22, it is the shipper's responsibility to properly classify a hazardous material. Such determinations are not required to be verified by this Office. Generally, the manufacturer of a material has the knowledge to properly classify and is required to properly classify the hazardous material prior to initial shipment. Since you did not include any specific information on your compressed gas, we can not confirm your determination.

I hope this satisfies your request.

Sincerely,

Delmer F. Billings  
Chief, Standards Development  
Office of Hazardous Materials Standards



**SPECTRA GASES**

3434 Route 22 West • Branchburg, NJ 08876 USA

Tel: (908) 252-9300 • (800) 932-0624 • Fax: (908) 252-0811

Boothe  
§ 173.22

July 20, 1998

Mr. Ed Mazzullo, Director  
D.O.T. Office of Hazardous Materials Standards  
400 Seventh Street S.W.  
Washington, D.C. 20590

Dear Mr. Mazzullo:

I have been referred to your office by Richard Tarr (one of DOT's chemists) whom I reached after speaking with Harpreet Singh in the Competent Authority Division.

We have an overseas customer requesting that we furnish documentation from D.O.T. to confirm that Spectra Gases, Inc. has correctly classified the gas mixture in question

Spectra Gases, Inc. has informed our customer that proper shipping names are assigned by the manufacturer/shipper, not by DOT. We provided them with relevant 49 CFR regulations regarding classification of gas mixtures and with our classification process for this mixture in particular. Our customer remains unconvinced that Spectra Gases, Inc. is the final authority regarding assignment of this proper shipping name/classification. Their opinion is probably strongly based on their previous experience with documentation provided by DOT Competent Authority (see attached --dated 1985?).

In conclusion, we are requesting that your department please confirm whether classification of this mixture (specifications attached) as a Compressed Gas, n.o.s. UN 1956 (Class 2.2) is correct or not. If this is not possible, I would be grateful for written response to the effect that DOT does not provide this type of documentation.

Sincerely,

Elaine Bradford  
Safety/Regulatory Affairs Director

Phone: 908-252-9300 ext 230

Fax: 908-252-0811

E-mail: [ElaineB@SGI-East.spectra-gases.com](mailto:ElaineB@SGI-East.spectra-gases.com)

Attachments:

- (1) June 29 1985 (?) document from US DOT Competent Authority for the United States
- (2) specifications of compressed gas mix in question (55 components, each at 1ppm; balance Nitrogen)

'98年06月17日(木) 17:45 宛先 0-0332871536

陸信 運輸管 関東運輸局

P02/02

US Department of Transportation  
Research and Special Programs Administration

400 Seventh Street, SW  
Washington, DC 20590

The US DEPARTMENT OF TRANSPORTATION  
Competent Authority for the United States

CLASSIFICATION OF EXPLOSIVES

Based upon a request by Terry Kost on behalf of Maxton International, Inc., 3350 Airport Road, Ogden, Utah, the following items are classed in accordance with Section 173.56, Title 49, Code of Federal Regulations (49 CFR).

U.S. PROPOSED SHIPPING NAME AND NUMBER:

Compressed gas, n.o.s., UN1956 (see note 1)

U.S. CLASSIFICATION CODE: 2.2

REFERENCE NUMBER

PRODUCT DESIGNATION/PART NUMBER

EX-950617D

702250-01, -02, -03

Note 1 - Pressure vessels used in the devices given in this approval must be in compliance with requirements for the gas or gases it contains prescribed in 49 CFR 173.301, 173.302 or 173.306(a)(1).

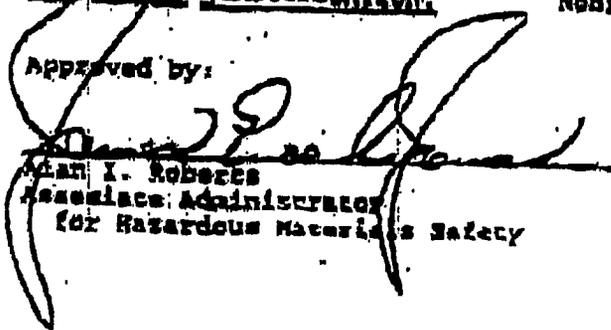
\*\*\* The following is provided to facilitate transition to the UN system \*\*\*

Classification under Sections 173.56 or 173.56a (49 CFR):

DOT DESCRIPTION/COMMERCIAL NAME: Compressed gas, n.o.s.

DOT HAZARD CLASSIFICATION: Nonflammable gas

Approved by:



Alan Y. Roberts  
Assistant Administrator  
for Hazardous Materials Safety

JUN 29 1998

(DATE)

**55 COMPONENTS at 1 ppm ea**

ETHYLENE  
ACETYLENE  
ETHANE  
PROPYLENE  
PROPANE  
ISOBUTANE  
1-BUTENE+1,3-BUTADIENE  
BUTANE  
TRANS-2-BUTENE  
CIS-2-BUTENE  
2-METHYL-2-BUTENE  
ISOPENTANE  
ACETONE  
1-PENTENE  
N-PENTANE  
ISOPRENE  
TRANS-2-PENTENE  
CIS-2-PENTENE  
3-METHYL-1-BUTENE  
2,2-DIMETHYLBUTANE  
CYCLOPENTENE  
4-METHYL-1-PENTENE  
CYCLOPENTANE  
2,3-DIMETHYLBUTANE  
2-METHYLPENTANE  
3-METHYLPENTANE  
N-HEXANE  
TRANS-2-HEXENE  
CIS-2-HEXENE  
METHYLCYCLOPENTANE  
2,4-DIMETHYLPENTANE  
BENZENE  
CYCLOHEXANE

STYRENE  
O-XYLENE  
NONANE  
ISOPROPYLBENZENE  
N-PROPYLBENZENE  
1,3,5-TRIMETHYLBENZENE  
1,2,4-TRIMETHYLBENZENE  
1,3-BUTADIENE  
2-METHYLHEXANE  
2,3-DIMETHYLPENTANE  
3-METHYLHEXANE  
2,2,4-TRIMETHYLPENTANE  
HEPTANE  
METHYLCYCLOHEXANE  
2,3,4-TRIMETHYLPENTANE  
TOLUENE  
2-METHYLHEPTANE  
3-METHYLHEPTANE  
N-OCTANE  
ETHYLBENZENE  
P-XYLENE  
M-XYLENE

Balance Nitrogen, compressed