



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

FEB 19 1998

Mr. Ruben E. Morales
Technical Chemical Company
Post Office Box 540095
Dallas, TX 75354

Dear Mr. Morales:

This is in response to your letter regarding dual marking on packages containing "Engine starting fluid," under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) and the International Maritime Dangerous Code (IMDG Code). I apologize for the delay in responding and hope it has not caused any inconvenience.

A final rule under Docket HM-215B [62 FR 24690; 05/06/97] revised the § 172.101 Hazardous Materials Table (§ 172.101 HMT). In this final rule, the description "Engine starting fluid with flammable gas, 2.1, UN 1960" was removed from the § 172.101 HMT, and thus is not an acceptable proper shipping name under the HMR. This final rule is effective 10/1/98 for domestic shipment.

Under the HMR, with certain exceptions, if all or part of the transportation is by vessel, a hazardous material which is classed, packaged, marked, labeled, placarded and described in accordance with the requirements of the IMDG Code may be offered and accepted, and transported in the United States (see § 171.12(b)).

For your information, in the § 172.101 HMT and the 10th revised edition of the U.N. Recommendations, the designation "Aerosols, 2.1 UN 1950" is the proper shipping name for "Engine starting fluid with flammable gas."

I hope this information is helpful. If we can be of further assistance, please contact us.

Sincerely,

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



TCC

TECHNICAL CHEMICAL COMPANY

JOHNSEN'S

SERCON

Engine
File 172.300
SC 230,

Edward T Mazzullo
Director's Office of Hazardous Materials Standards
US DOT / RSPA
400 7th Street SW Room 8100
Washington, D.C. 20590-0001

7-29-97

Mr. Mazzullo,

I have a question concerning DOT designation and IMDG designation of hazardous materials on shipping cartons.

TCC currently packages engine starting fluid for domestic and export markets. DOT recognizes engine starting fluid as a proper shipping name, along with the hazard class, ID no. and packing group, IMDG does not. TCC has marked all of its shipping cartons with the DOT designation. I would like to mark the shipping cartons with both designations on separate panels, indicating that *THIS CLASSIFICATION IS FOR DOT* and *THIS CLASSIFICATION IS FOR IMDG*.

My question is: Can TCC mark its shipping cartons with both designations (DOT & IMDG) for its engine starting fluid products? as long as each panel is marked accordingly to the proper regulations.

This will make it possible to meet both requirements with one carton. I spoke to Helen Ingram via the phone today and she indicated that, TCC can mark its engine starting fluid shipping cartons with both designations. I would like to have a written response from your office. Please respond to my question promptly, as we are preparing for our engine starting fluid season.

Thank you for your help in this matter, if you should have any questions please feel free to contact me at 1-800-527-0885 ext. 147.

Sincerely,

Ruben E Morales
Technical Service Manager

Copy: File