U.S. Department
of Transportation
**Research and
Special Programs
Administration**

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

MAR 17 2000

Ms. Laura Bridges
Sr. Packaging Engineer
SC Johnson Wax Professional
8310 16th Street
Sturtevant, WI 53177-0902

Ref. No. 00-0022

Dear Ms. Bridges:

This is in response to your letter dated January 8, 2000, requesting clarification on the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180. Specifically, you ask that when determining whether a Class 8 (corrosive) liquid is organic or inorganic, is it appropriate to consider only those components that cause the material to be corrosive, or to base the determination on the whole mixture (i.e., a corrosive liquid and the remainder being water).

When determining whether a mixture is organic or inorganic, a shipper must make that determination based on the hazardous components in the mixture. Therefore in your situation, the shipping description should reflect the corrosive constituent in the mixture or solution.

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

Sincerely,

Hattie L. Mitchell

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

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US Department of Transportation
Research and Special Programs Administration
Office of Hazardous Materials Standards
Mr. Ed Mazzulo
400 Seventh Street, S.W.
Washington, DC 20590

Dear Mr. Mazzulo:

When determining whether a material, classified as a "Corrosive Liquid," is organic or inorganic, is it appropriate to consider only those components that cause the material to be corrosive, or to base the determination on the whole "mixture" (i.e. the complete formula)?

Thank you for your time and consideration.

Sincerely,

Laura Bridges
Sr. Packaging Engineer
Johnson wax Professional