



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

MAR 30 2000

Ms. Kathy M. Koppe
Horning's Incorporated
P.O. Box 88416
Indianapolis, IN 46208

Ref. No. 00-0065

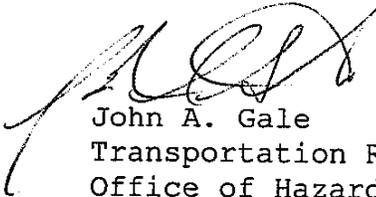
Dear Ms. Koppe:

This is in response to your letter dated February 24, 2000 requesting information concerning the applicability of Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) to several materials.

Under § 173.22, it is a shipper's responsibility to determine whether a material meets the definition of the listed hazard class or is not subject to the HMR. Such determinations are not required to be verified by this office nor does the Department have resources to perform routine verifications.

I hope this satisfies your request.

Sincerely,



John A. Gale
Transportation Regulations Specialist
Office of Hazardous Materials Standards



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173.22



HORNING'S
INCORPORATED
QUALITY CLEANING PRODUCTS

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00-0065

1176 W. 28th Street
P. O. Box 88416
Indianapolis, IN 46208

February 24, 2000

(317) 926-1267
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U.S. Department of Transportation
Research and Special Programs Administration
Attn: Office of Hazardous Materials Standards
400 7th Street SW
Washington, DC 20590

Re: Request for Interpretation

Dear Sirs,

I would like to request an interpretation and definition of the following chemicals. Please include with this information what the guidelines are for shipping names and the guidelines for shipping as a corrosive material class 8.

Under the current ruling "HM-215A" it appears as if the products must be shipped as a corrosive material, however, after running tests on our product it seems as if it may not fall within your guidelines as corrosive. According to the MSDS it is not a corrosive. We have also located information that states Sodium Metasilicate both Anhydrous and Pentahydrate are subject to a name change in shipping. With regards to the name change, what are the current guidelines? Are these products subject to the name change as a "raw material" only or as either a "raw material" or as an "ingredient"?

Please research the following:

Sodium Metasilicate Anhydrous
Sodium Metasilicate Pentahydrate
Disodium Trioxosilicate Pentahydrate
Corrosive Solid Basic, Inorganic, N.O.S.

Thank you, for your assistance in this matter and we are looking forward to your response. If you should need any further information, please feel free to contact either Mathew or Jim Horning at 317-926-1267.

Sincerely,

Kathy M. Koppe TH
Kathy M. Koppe
Risk Manager

Cc: Hornings Inc.
Bob Quillanan DOT - Office of Hazardous Materials Enforcement