



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

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

APR 8 2002

Mr. Mark Chevrier
Director of Operations
Elite Consumer Products
203 West Avenue
Ludlow, MA 01056

Reference No.: 02-0032

Dear Mr. Chevrier:

This is in response to your letter inquiring whether a 6.0 wt % sodium hypochlorite solution is subject to the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). You submitted skin corrosivity test data for the material. In a telephone conversation with a member of my staff, you stated that the material is packaged in one gallon containers.

Based on the data you provided, we agree that the 6% wt sodium hypochlorite solution is not corrosive to skin. However, without test data for corrosivity on metals (steel and/or aluminum), we are unable to make the determination that your material does not meet the definition in § 173.136 of a corrosive material (Class 8) under the HMR.

Sincerely,

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



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Elite

December 17, 2001

Mr. Edward T. Mazzullo
Director, Office of Hazardous Materials Standards
U.S. DOT/ RSPA (DHM-10)
400 Seventh Street, SW
Washington, DC 20590-0001

RE: Corrosivity of Sodium Hypochlorite Solution

Dear Mr. Mazzullo:

Per a recent discussion on December 17, 2001 with Mr. Ben Supko at the Hazardous Materials Information Center, it was his recommendation that Elite contact your office.

Because of the listing in the DOT Hazardous Materials Table, inquiries have arisen from Elite's corrugated supplier as to the correct classifications (markings) that should appear on the cartons containing 6.0 wt % Sodium Hypochlorite.

In previous letters from the Clorox Company and the KIK Corporation to your office on this subject, both companies presented data that determined that their products were not classified as corrosives in accordance with the definition specified in 49 CFR 173.136.

Elite submitted for testing, a sample of our 6.0 wt % Sodium Hypochlorite solution for corrosivity to Tox Monitor Laboratories, Inc, Oak Park, IL. The results of that test (enclosed for your review) show that "In accordance with D.O.T. Guidelines, Federal Register, Volume 55, No. 246, Elite Consumer Products sample identified as 6 wt % Sodium Hypochlorite, is not a corrosive agent".

Upon your review and assuming that you agree with the conclusion of this test, Elite would appreciate your issuing a letter confirming the department's conclusion that the Sodium Hypochlorite solution tested is not a corrosive material within the meaning of the current regulatory guidelines.

Thank you for your attention to this matter. If you need additional information, please contact Richard Tata at (413) 589-1600 extension 303.

Sincerely,



Mark Chevrier
Director of Operations, Elite Consumer Products

CC: Richard Tata, Elite Consumer Products

Enclosures: D.O.T. Corrosivity Test Results

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