



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

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

APR 18 2002

Ms. Ann Marie Williams  
Regulatory Affairs Administrator  
Octel Starreon LLC.  
200 Executive Drive  
Newark, Delaware 19702

Ref. No. 02-0048

Dear Ms. Williams:

This responds to your February 12, 2002 letter requesting clarification on the proper shipment of "motor fuel antiknock" that is transported to the United States under the International Maritime Dangerous Goods (IMDG) Code and the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). You state that the material is transported in a bulk packaging by vessel. Your questions are paraphrased and answered below.

- Q1. Is it permissible to leave the "Marine Pollutant" marking in place when the containers are shipped on-road?
- A1. Yes. It is permissible to leave the "Marine Pollutant" mark in place when the containers are shipped on-road.
- Q2. In regard to the information required on the shipping papers, is the following appropriate?  
"Motor fuel Antiknock Mixtures, 6.1, (3), UN 1649, PG I  
RQ (Tetraethyl Lead, Ethylene Di-Bromide)"
- A2. Hazardous materials transported under the IMDG Code are subject to the conditions and restrictions contained in 49 CFR 171.12. The words "Marine Pollutant" must be included on shipping documents. See Chapter 5.4.1.1 of the IMDG Code and 49 CFR 172.203 (1)(2). For example, a correct shipping description for your shipment would read "Motor fuel anti-knock mixtures, 6.1, 3, UN 1649, PG I, RQ (Tetraethyl lead, Ethylene dibromide), Marine Pollutant".
- Q3. What is the proper way to include the Marine Pollutant components (Tetraethyl Lead and Ethylene Di-Bromide) in the above shipping information?
- A3. The name of the component or components which make a material a marine pollutant must appear in parentheses in association with the basic description. See 49 CFR 172.203(1)(1).



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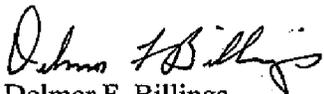
172.202

Q4. One of our products has the chemical name, 2,4-Dimethyl-6-Tert-Butylphenol. Butylphenols were removed from the Marine Pollutants list. However, Dimethyl Phenols remain on the Marine Pollutant list. Would D.O.T. consider this material to be a Dimethyl Phenol?

A4. No, 2, 4-Dimethyl-6-Tert-Butylphenol is not synonymous with Dimethylphenol. For your information, Dimethylphenols, liquid or solid will be removed from the List of Marine Pollutants in Appendix B to § 172.101 in a rulemaking document in the near future.

I hope this answers your inquiry.

Sincerely,



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



Boothe  
 \$172.202  
 \$172.504  
 Placarding  
 Shipping Papers  
 02-0048

February 12, 2002

John Gale  
 Office of Hazardous Materials Standards  
 Research and Special Programs Administration  
 U.S. Department of Transportation  
 400 Seventh Street, SW  
 Washington, DC 20590-0001

Dear Mr. Gale:

Octel imports Motor Fuel Antiknock, UN 1649, from Europe. The product is shipped in bulk by vessel. It is placarded with a "Marine Pollutant" placard and a "Toxic" placard when it is shipped from Europe in compliance with IMDG regulations.

Can you provide answers to the following questions concerning our Motor Fuel Antiknock and one of our other products?

- 1) Is it permissible to leave the "Marine Pollutant" placard in place when the containers are shipped on-road?
- 2) In regard to the information required on the shipping papers, is the following format appropriate?

Motor Fuel Antiknock Mixtures, 6.1 (3), UN 1649, PG I,  
 RQ (Tetraethyl Lead, Ethylene Di-Bromide)

- 3) What is the proper way to include the Marine Pollutant components (Tetraethyl Lead and Ethylene Di-Bromide) in the above shipping information?
- 4) One of our products has the chemical name 2,4-Dimethyl-6-Tert-Butylphenol. Butylphenols were removed from the Marine Pollutants list. However, Dimethyl Phenols remain on the Marine Pollutant list. Would D.O.T. consider this material to be a Dimethyl Phenol?

6.1 & 3 *labeled*

If you need any further information, do not hesitate to contact me at (302) 451-1362.

Regards,

*Ann Marie Williams*

Ann Marie Williams  
 Regulatory Affairs Administrator  
 amw