



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

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

FEB 24 2004

Mr. Gordon W. Rousseau
5448 Solway Drive
Melbourne Beach, Florida 32951

Ref. No. 04-0033

Dear Mr. Rousseau:

This responds to your February 23, 2004 letter on behalf of PPG Industries, Inc., concerning the transportation of calcium hypochlorite, hydrated, UN 2880, under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if calcium hypochlorite, hydrated, UN 2880, transported in 300- and 425-lb. fiber drums, is a forbidden material within the meaning of § 173.21 of the HMR.

The answer is no. Notwithstanding that the self-accelerated decomposition temperature (SADT) of calcium hypochlorite, hydrated, UN 2880, in the drums is slightly less than 50 °C, the material is not forbidden under § 173.21 because the material is not likely to decompose under normal conditions of transport when shipped in accordance with applicable regulatory requirements. Under the HMR, calcium hypochlorite, hydrated, UN 2880, is not subject to the controlled temperature provisions of § 173.21(f) when transported in the quantities and packagings specified in your letter. All applicable HMR requirements for shipping documentation, packaging, marking, labeling, placarding, and stowage and segregation must be met. Similarly, calcium hypochlorite, hydrated, UN 2880, is not a prohibited material or subject to temperature control requirements under the provisions of the International Maritime Dangerous Goods (IMDG) Code. Under both the HMR and the IMDG Code, calcium hypochlorite, hydrated, UN 2880, is subject to stowage provisions that require it to be stowed away from heat.

I hope this information is helpful. Please let me know if you have questions or require additional information.

Sincerely,

Edward T. Mazzullo
Director, Office of Hazardous
Materials Standards



040033

173.21

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Gorsky
§ 173.21
Forbidden
Materials
04-0033

February 23, 2004

Edward T. Mazzullo, Director
Office of Hazardous Materials Standards
Research and Special Projects Administration
U.S. Department of Transportation
Washington, DC 20590

Re: Authorized Transportation of Calcium Hypochlorite Hydrated
(UN2880) Pursuant to 49 C.F.R. Subchapter C

Dear Mr. Mazzullo:

I am writing on behalf of PPG Industries, Inc. (PPG). As discussed, PPG has long understood that the transportation of UN2880 in 300 and 425 lb. fiber drums is authorized under the provisions of 49 C.F.R. Subchapter C. I should be grateful if you would confirm that PPG's interpretation of the relevant regulatory provisions is correct.

It has been suggested that even though authorized by the package requirements of the Hazardous Materials Table (HMT), 49 CFR § 172.101, the shipment of UN2880 in 300 and 425 lb. drums is nevertheless "forbidden" by § 173.21(f) because the SADT of the product in those drum sizes is less than 50°C. (IMO documentation indicates that this SADT information was known as far back as 1980. According to information before the IMO and DOT it is clear that the critical temperature of the product in these drums is below 50°C. Information PPG previously furnished to DOT confirms the earlier IMO information that the SADT of the product in these drums is between 47°C and 50°C.)

In contrast, it is PPG's understanding based upon its prior meetings with DOT that UN2880 is not forbidden by § 173.21(f) merely because its SADT is less than 50°C. To the contrary, the shipment of UN2880 in these drum sizes is specifically authorized in the HMT because DOT recognizes that UN2880 is safe if shipped in accordance with HMT and IMDG Code requirements. UN2880 has therefore never been listed as a "forbidden" material in the HMT nor as "prohibited" by IMO, and DOT has never supported efforts at the IMO and UN to impose temperature control requirements on UN2880. Indeed, in January 2000, DOT specifically opposed proposals to amend the IMDG Code to impose temperature control requirements on UN2880. Additionally, in July 2002, DOT did not support proposals by

Germany and Japan to require temperature controls on UN2880. DOT surely would not have done so if the shipment of UN2880 in 300 and 425 lb. drums were forbidden by § 173.21(f).

Can you therefore please confirm that the shipment of UN2880 in 300 and 425 lb. fiber drums is not "forbidden" simply because the SADT threshold is below 50°C, and that UN2880 is not on account of § 173.21(f) subject to the controlled temperature provisions in 49 C.F.R. or the IMDG Code?

Thank you for your assistance.

Very truly yours,



Gordon W. Rousseau