



U.S. Department of Transportation  
**Pipeline and Hazardous Materials**  
**Safety Administration**

1200 New Jersey Avenue, SE  
Washington, DC 20590

MAR 31 2015

Mr. Gustavo Navar  
FSA Tech Services  
Mosaic Crop Nutrition, LLC  
13830 Circa Crossing Drive  
Lithia, FL 33547

Reference No. 14-0244

Dear Mr. Navar:

This is in response to your December 11, 2014 letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the shipment of fluorosilicic acid. Specifically, you ask if this material, when in an aqueous solution with a concentration range of 23 to 25 percent fluorosilicic acid, must be described on the shipping paper using the proper shipping name followed by the word "solution" in accordance with § 172.101(c)(10).

The answer is yes. As specified in § 172.101(c)(10), the proper shipping name of a hazardous material such as fluorosilicic acid which is comprised of a single predominant hazardous material identified in the § 172.101 Hazardous Materials Table by technical name, and one or more hazardous and/or non-hazardous material, must be described using the proper shipping name of the hazardous material and the qualifying word "mixture" or "solution" as appropriate.

I trust this information is helpful. If you have further questions, please do not hesitate to contact this office.

Sincerely,

A handwritten signature in black ink that reads "T. Glenn Foster".

T. Glenn Foster  
Chief, Regulatory Review and Reinvention Branch  
Standards and Rulemaking Division

Mosaic Crop Nutrition, LLC  
13830 Circa Crossing Drive  
Lithia, FL 33547

~~Wiener~~ Babich  
172.101  
General Requirement  
14-0244



December 11, 2014

Mr. Charles E. Betts  
Director, Standards and Rulemaking Division  
U.S. DOT/PHMSA (PHH-10)  
1200 New Jersey Avenue, SE East Building, 2nd Floor  
Washington, DC 20590

RE: Request for Letter of Interpretation

Dear Mr. Betts:

Mosaic Crop Nutrition, LLC (Mosaic) seeks guidance regarding the proper shipping description for shipments of a solution of fluorosilicic acid and water. Fluorosilicic acid is a material listed or identified by name on the Hazardous Materials Table at 49 CFR Section 172.101. Mosaic ships an aqueous solution of with a concentration range of 23-25% fluorosilicic acid with the balance made up of water. Hazardous materials descriptions and proper shipping names for mixtures or solutions are addressed in 49 CFR Section 172.101(c)(10), which provides: "(i) A mixture or solution not identified specifically by name, comprised of a hazardous material identified in the Table by technical name and non-hazardous material, shall be described using the proper shipping name of the hazardous material and the qualifying word "mixture" or "solution", as appropriate ...."

Based on the regulation, it is my understanding that the correct shipping description for the material is "UN1778, Fluorosilicic acid, solution, 8, II". However, I have seen the material described on shipping papers without the word "solution" following the proper shipping name, as "UN1778, Fluorosilicic acid, 8, II", and I request your guidance on the need to include the word "solution" following the proper shipping name for this material.

Your written response to this request is greatly appreciated. If you require any further information regarding this request please feel free to contact me at [Gustavo.Navar@mosaicco.com](mailto:Gustavo.Navar@mosaicco.com) or 813-500-6748.

Sincerely,

A handwritten signature in black ink, appearing to read "Gustavo Navar", with a large, stylized flourish on the left side.

**Gustavo Navar | FSA Tech Services**

Mosaic Crop Nutrition, LLC | 13830 Circa Crossing Drive | Lithia, Florida 33547  
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