



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

1200 New Jersey Ave, S.E.
Washington, D.C. 20590

JUL 31 2009

Mr. Mark Ryan
Cytec Industries
Stamford Hazards Lab
1937 W Main St
Stamford, CT 06902-4516

Ref. No. 09-0144

Dear Mr. Ryan:

This responds to your June 19, 2009 letter requesting clarification on whether the attached ARC test method may be used to determine a material's self-accelerated decomposition temperature (SADT) under §173.21(f) of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171–180). Specifically, you ask if a test method, other than those listed in Part II, Section 28, test series H of the UN Manual of Tests and Criteria, may be used to meet the requirements of § 173.21(f) of the HMR.

The answer is yes. Section 173.21(f) specifies the SADT may be determined by any of the test methods described in Part II, of the UN Manual of Tests and Criteria. These UN provisions, in 28.2.2, also provide that test methods, other than those listed, are authorized provided the alternative method gives the correct SADT of the material as packaged for transport.

I trust this satisfies your inquiry. Please contact us if we can be of further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "H. Mitchell", written over a white background.

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

Drakeford, Carolyn (PHMSA)

From: Gorsky, Susan (PHMSA)
Sent: Friday, June 19, 2009 7:29 AM
To: Drakeford, Carolyn (PHMSA)
Subject: FW: Alternative method for SADT test
Attachments: FAI-2009-139 - Cytec Alternative SADT Method.pdf

Andrews
 § 173.21 (f)
 Applicability
 09-0144

From: Ryan, Mark [mailto:Mark.Ryan@cytec.com]
Sent: Thursday, June 18, 2009 1:58 PM
To: Gorsky, Susan (PHMSA)
Cc: Ke, Charles (PHMSA); Brown, James
Subject: RE: Alternative method for SADT test

Dear Ms. Gorsky,

We developed the attached alternative SADT method along with a consultant, Fauske + Associates, and obtained approval for using the method from the DOT. If it is not too much trouble, we would like to have a brief official letter for our files referencing the report that indicates the method has been accepted by the DOT.

Please let me know if I can provide any further information.

Regards,

Mark Ryan

From: charles.ke@dot.gov [mailto:charles.ke@dot.gov]
Sent: Thursday, June 18, 2009 1:51 PM
To: Ryan, Mark
Cc: charles.ke@dot.gov; susan.gorsky@dot.gov
Subject: RE: Alternative method for SADT test

If you need an official interpretation letter, you need to send in a request together with your document to our Standards Office attn: Ms. Susan Gorsky.
 Charles Ke

From: Ryan, Mark [mailto:Mark.Ryan@cytec.com]
Sent: Thursday, June 18, 2009 1:46 PM
To: Ke, Charles (PHMSA)
Subject: RE: Alternative method for SADT test

Dear Mr. Ke,

If it not too much trouble, we would like to have a brief official letter for our files referencing the report (FAI/09-139, An Alternative Method for Determination of the Self-Accelerating Decomposition Temperature) that indicates the method has been accepted by the DOT.

Thanks for the good news,

Mark

6/19/2009