

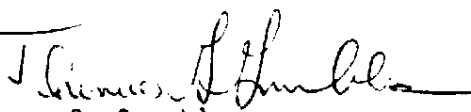


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Interoffice Communication

To Dave Chambers
From Tom Grumbles
Date July 19, 1983
Subject DOT CLASSIFICATION FOR ETHER SULFATES

Currently we class our Ether Sulfates (ALFONIC 1412-A and 1412-S) as "combustible", even though flash points for these products are below 100°F. This was done due to an exemption in the regs for materials containing less than 24% alcohol. The Monday, June 20, Federal Register, Pg. 28101, 173.115, 2ii, (attached) adds the statement "and contains no less than 50% water" to this exemption. This would apparently eliminate the exemption for ether sulfates, and they would have to be reclassified as flammable liquids. Would you please review this issue and let me know if these products need to be reclassified.


Thomas G. Grumbles

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Attachment

cc Bill Groves

CCR 000000787

§ 173.110 Charged well casing jet perforating guns, total explosive content in guns not exceeding 20 pounds per motor vehicle.

(a) Charged well casing jet perforating guns transported by motor vehicles operated by private carriers engaged in well operations in which the total weight of the explosive contents of shaped charges assembled to guns being transported does not exceed 20 pounds per such vehicle must be packed as prescribed in § 173.80(b), (c), (d) and (e).

(b) Charged well casing jet perforating guns may be offered for transportation and transported only by private carrier by highway.

(c) Charged well casing jet perforating guns may be offered for transportation and transported by private offshore well supply vessels only when carried in special motor vehicles as prescribed in § 173.80 or on offshore down hole tool pallets provided that:

21. In § 173.115 paragraphs (b)(2), (d)(1) and (e) are revised to read as follows:

§ 173.115 Flammable, combustible, and pyrophoric liquids; definitions.

(b) *Combustible liquid.*

(2) For the purposes of this subchapter—

(i) An aqueous solution containing 24 percent or less alcohol by volume is considered to have a flash point of no less than 100° F. (37.8° C) if the remainder of the solution is not subject to this subchapter, and

(ii) An aqueous solution containing 24 percent or less alcohol by volume is not subject to the requirements of this subchapter if it contains no less than 50 percent water and no material (other than the alcohol) which is subject to this subchapter.

(d) *Flash point.* (1) "Flash point" means the minimum temperature at which a liquid gives off vapor within a test vessel in sufficient concentration to form an ignitable mixture with air near the surface of the liquid and shall be determined as follows:

(i) For a homogeneous, single-phase, liquid having a viscosity less than 45 S.U.S. at 100° F. (37.8° C) that does not form a surface film while under test, one of the following test procedures shall be used:

(A) Standard Method of Test for Flash Point by Tag Closed Tester, (ASTM D58-79); or

(B) Standard Methods of Test for Flash Point of Liquids by Setaflash Closed Tester, (ASTM D3278-78).

(ii) For a liquid other than one meeting all of the criteria of paragraph (d)(1)(i) of this section, one of the following test procedures shall be used:

(A) Standard Method of Test for Flash Point by Pensky-Martens Closed Tester, (ASTM D93-80). For cutback asphalt, use Method B of ASTM 93-80. (Alternate tests authorized in this standard may be used); or

(B) Standard Methods of Test for Flash Point of Liquids by Setaflash Closed Tester, (ASTM D3278-78).

(c) "S.U.S." means Saybolt Universal Seconds as determined by the Standard Method of Test for Saybolt Viscosity (ASTM D86-56) (reapproved 1966) and may be determined by use of the S.U.S. conversion tables specified in the Standard Method for Conversion of Kinematic Viscosity to Saybolt Universal Viscosity or to Saybolt Furol Viscosity ASTM D2161-79 following determination of viscosity in accordance with the Standard Test Method for Kinematic Viscosity of Transparent and Opaque Liquids (and the Calculation of Dynamic Viscosity) (ASTM D445-79).

22. In § 173.134, the first sentence of paragraph (a)(1)(iii) is revised to read as follows:

§ 173.134 Pyrophoric liquids, n.e.s.

(a) . . .
(1) . . .

(iii) Overpacked in a Specification 12A or 12B (§§ 178.210, 178.205 of this subchapter) fiberboard box or Specification 33A (§ 178.150 of this subchapter) polystyrene case. . . .

23. In § 173.244, paragraphs (a)(3) and (a)(4) are redesignated paragraphs (a)(4) and (a)(5) respectively and a new paragraph (a)(3) is added to read as follows:

§ 173.244 Limited quantities of corrosive materials.

(a) . . .

(3) Corrosive liquids in glass containers having a rated capacity not over 8 fluid ounces by volume in strong outside packaging and cushioned with sufficient absorbent material to completely absorb the liquid contents in the event of breakage, and which will not react chemically with the corrosive material.

24. In § 173.245, paragraph (b) is amended by adding a sentence at the end to read as follows:

§ 173.245 Corrosive liquids not specifically provided for.

(b) . . . For hazardous wastes and hazardous substances that would otherwise be subject to this paragraph, only the requirements of Parts 1 and 172 of this subchapter apply.

25. In § 173.245b, paragraph (a) is revised to read as follows:

§ 173.245b Corrosive solids not specifically provided for.

(6) Open head plastic drum or pail not exceeding 95 pounds net weight and not over 7-gallon capacity or closed head plastic drum not exceeding 550 pounds net weight and not over 55-gallon capacity.

26. In § 173.271, the title and the introductory text of paragraph (a) are revised to read as follows:

§ 173.271 Methyl phosphonic dichloride, phosphorus oxybromide, phosphorus oxychloride, phosphorus trichloride, and thiophosphoryl chloride.

(a) Methyl phosphonic dichloride, phosphorus oxybromide, phosphorus oxychloride, phosphorus trichloride, and thiophosphoryl chloride must be placed in specification containers as follows:

27. In § 173.277, paragraph (a)(9) is revised, paragraph (a)(10) is added and paragraph (g) is removed to read as follows:

§ 173.277 Hypochlorite solutions.

(a) . . .

(9) Specification MC 310, MC 311 or MC 312 (§ 178.243 of this subchapter). Tank motor vehicles. Tanks must be lined with rubber or other materials resistant to the lading. Continued use of nonspecification cargo tanks used to transport hypochlorite solutions prior to January 1, 1983, is authorized.

(10) Specification IM 101 portable tanks (§§ 178.270, 178.271 of this subchapter) are authorized under conditions specified in the IM Tank Table.

28. In § 173.308, the introductory text of paragraph (a) is revised to read as follows:

§ 173.308 Cigarette lighter or other similar device charged with fuel.

(a) In addition to the requirements of § 173.21(e), a cigarette lighter or other similar device charged with a flammable gas must be shipped as follows:

29. In § 173.357, paragraph (b)(3) is revised to read as follows: