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FROM: T. G. Grumbles
DATE: February 24, 1986

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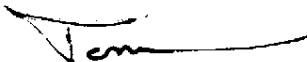
SUBJ: DOT DESCRIPTIONS FOR HAMMOND PRODUCTS

VISTA

Enclosed is a memo describing a review of the hazardous materials descriptions used for Hammond products and recommended changes. To assure compliance with DOT regulations, appropriately describe the products for shipment purposes, and avoid unnecessary superfund (spill) reporting, the recommended changes should be implemented.

These description changes will not change placarding practices for SA-597 and SA-697. It should be noted that C-550 and C-560 slurry in drum quantities would not be regulated as a hazardous material for transportation purposes.

Appropriate COED's hazardous materials description changes will be made in the near future to reflect the recommended changes. Please let me know if you have questions on the above.



Thomas G. Grumbles

ajo/8

Enclosure

DISTRIBUTION:

Bill Tuzinkiewicz
Matt Tonkovich
Art Russell

Gary Draper
Roscoe Cooley
Wayne Hilgers

VVV 000017310

TO: T. G. Grumbles

FROM: Michele M. Goodreau

DATE: January 24, 1986

Interoffice
Communication

SUBJ: HAZARDOUS MATERIALS DESCRIPTIONS

VISTA

Hazardous material descriptions, for the products manufactured at Hammond, have been reviewed for compliance with current Hazardous Materials Transportation (HMT) regulations. Based on this review, the descriptions should be updated. Proposed descriptions and justifications for the revisions are summarized below:

SA-597 Sulfonic Acid

Current: RQ, Dodecylbenzenesulfonic acid, Corrosive Material, NA2584. [placarded "Corrosive"]
Proposed: Corrosive Liquid, N.O.S., Corrosive Material, UN1760, RQ dodecylbenzenesulfonic acid. [placarded "Corrosive"]

SA-597 is most appropriately described as a corrosive mixture of alkybenzene sulfonic acids, containing approximately 25% dodecylbenzenesulfonic acid and less than 2% free sulfuric acid. Dodecylbenzene sulfonic acid is a hazardous substance under Superfund, and packages containing more than the reportable quantity (RQ), in this case 1000 pounds, must have it indicated on the shipping papers to allow for quick reporting by emergency response personnel.

Under IATA and International regulations, use of the ID number 2584 indicates that the material contains greater than 5% free sulfuric acid and Packing Group II must be used. Packing group II materials are subject to additional restrictions and requirements. Materials containing less than 5% free sulfuric acid, as is the case for SA-597, may use packing group III, which is the most appropriate, and least restrictive packing group.

SA-697

Current: RQ, Dodecylbenzenesulfonic acid, Corrosive Material, NA2584. [Placarded "Corrosive"]
Proposed: Corrosive Liquid, N.O.S., Corrosive Material, UN1760. [Placarded "Corrosive"]

SA-697 is most appropriately described as a corrosive mixture of alkylbenzene sulfonic acids, containing no dodecylbenzene sulfonic acid and less than 2% free sulfuric acid. The current description could lead to unnecessary Superfund reporting. Use of the ID number 2584 is also inappropriate, as discussed under SA-597, and imposes additional restrictions and requirements on shipments.

VVV 000017311

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C-550, C-560

Current: RQ, Sodium dodecylbenzenesulfonate, ORM-E, NA9146.

Proposed: Hazardous Substance, liquid, N.O.S., ORM-E, NA-9188, RQ
sodium dodecylbenzenesulfonate.

C-550 and C-560 are most appropriately described as a mixture containing 50-60% sodium alkylbenzene sulfonate (SAS). Of the total quantity of SAS, approximately 25% is sodium dodecyl benzene sulfonate. Even though these products do not meet the definition of any HMT hazard class, they are still regulated as hazardous substances when they contain greater than the reportable quantity (RQ) of a hazardous material. In this case, greater than 1000 pounds of sodium dodecylbenzene sulfonate. If they contain less than the RQ, they are not regulated for transportation purposes.

Please give me your input on this matter as soon as possible.

Thanks,

M. M. Goodreau

M. M. Goodreau

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