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Transportation/Hazardous Materials Regulations: Pipeline and Hazardous Materials Safety Administration Addresses Packing Group Classification

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The Pipeline and Hazardous Materials Safety Administration ("PHMSA") responded to question from Amazing Products, Inc. ("Amazing") regarding the Packing Group classification of certain material.

Amazing asked whether a solution containing 98 to 99% sulfuric acid (93% grade) and 1% Rodine is a Packing Group I or Packing Group II material under the federal Hazardous Materials Regulations.

PHMSA responded in a January 8th letter that the agency does not generally classify material for a shipper. However, the agency noted:

While the Materials Safety Data Sheet indicates the solution is a Packing Group II material, it does not provide an indication on how that determination was made.

PHMSA concluded that based on the information that the company provided and the accompanying safety data sheet:

... this material is composed of a single predominate hazardous material that is identified in the hazardous materials table (Sulfuric acid) and another material (Rodine 85). Provided the presence of Rodine 85 does not impact the hazard class or packing group of the predominate hazardous material the material must be described using the proper shipping name of the hazardous material and the qualifying "work mixture" or "solution." When applied to this case, the shipping description for this material must be UN1830, Sulfuric acid, solution, 8, PG II. If the presence of Rodine 85 changes the hazard class or packing group from the specifically identified material, or significantly changes the measures to be taken in emergencies, or if the material can be appropriately described by a shipping name that describes its intended application, then a suitable generic or n.o.s. description must be selected and an assigned an appropriately packing group based on the properties of the solution e.g. corrosive liquids, n.o.s., or compounds, cleaning liquid.

The agency cited § 172.101(c)(10).

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