



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue SE
Washington, DC 20590

JAN 08 2016

Ms. Jackie Skaggs
Shipping Department
Amazing Products, Inc.
6214 Strawberry Lane
P.O. Box 14226
Louisville, KY 40214

Ref. No.: 15-0169

Dear Ms. Skaggs:

This is in response to your letter dated July 13, 2015 requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) relating to the hazard classification of a solution containing 98-99 % sulfuric acid (93% grade) and 1% Rodine. Specifically you ask whether this product is a Packing Group I or Packing Group II material.

In accordance with § 173.22, it is the shipper's responsibility to properly classify a hazardous material. This Office does not generally perform that function. While the safety data sheet indicates the solution is a Packing Group II material, it does not provide an indication on how that determination was made.

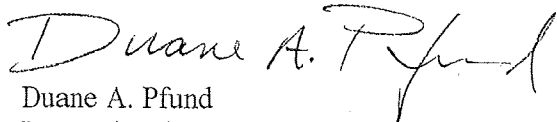
Based only on the information you provided in your letter and the accompanying safety data sheet, this material is composed of a single predominant hazardous material that is identified in the hazardous materials table (Sulfuric acid) and another material (Rodine 85). Provided the presence of Rodine 85 does not impact the hazard class or packing group of the predominant hazardous material the material must be described using the proper shipping name of the hazardous material and the qualifying word "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 appropriate packing group based on the properties of the solution e.g. corrosive liquids, n.o.s. or compounds, cleaning liquid. See § 172.101(c)(10).

If you have further questions, please do not hesitate to contact this office.

Sincerely,

A handwritten signature in cursive script that reads "Duane A. Pfund". The signature is written in dark ink and is positioned above the printed name and title.

Duane A. Pfund
International Standards Coordinator
Standards and Rulemaking Division