



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

JUL 1 1999

400 Seventh Street, S.W.
Washington, D.C. 20590

Mr. Bill Dowse
Distribution Manager
Chemtronics
8125 Cobb Center
Kennesaw, Georgia 30152

Ref. No. 99-0120

Dear Mr. Dowse:

This is in response to your letter concerning the consumer commodity exceptions under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171- 180). Your company is planning to ship Difluoroethane, R 152a, 2.1, UN1030 in aerosol containers under DOT exemption E-11516.

Your material must meet the definition of consumer commodity in § 171.8 and the limited quantity provisions of § 173.306 in order to be renamed and reclassified as "Consumer Commodity, ORM-D." For a pure flammable gas, you would be required to meet the provisions in § 173.306(a)(1), which requires your material to be in a container of not more than 4 fluid ounces capacity (7.22 cubic inches or less). If you plan on shipping containers which exceed the 4 fluid ounce capacity limit, your material will not be eligible for the consumer commodity exception.

I hope this satisfies your request.

sincerely,

John A. Gale
Transportation Regulations Specialist
Office of Hazardous Materials Standards



990120

173.306

Chemtronics



BAH
§ 173.306
99-0120

May 4, 1999

Mr. Edward Mazzullo, Director
Office of Hazardous Standards
Department of Transportation

Dear Ed,

Chemtronics is planning a new aerosol product that would contain Difluoroethane, R152a, 2.1, UN1030. We have been granted party status to exemption 11516. We will meet all the requirements of exemption 11516. This new product will be a duster and therefor expel the vapor.

The clarification I am seeking is as follows : Can this product be classified as a Consumer Commodity ORM-D?

Your response on this matter is greatly appreciated.

Sincerely,

Bill Dowse
Distribution Manager

Can not go ORM-D
pure flammable gas
not aerosol § 173.306(w)(1)
4 fl oz capacity 7.22 cu inches