



U.S. Department
of Transportation
**Research and
Special Programs
Administration**

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

OCT 22 2003

Mr. Raymond V. Brandes
Ray-Vin.Com
1844 Mt. Cello Rd.
Marianna, FL 32448-5365

Ref. No. 03-0179

Dear Mr. Brandes:

This is in response to your letter dated July 8, 2003 and subsequent telephone conversation with a member of my staff, concerning the regulation of calcium carbide pursuant to the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Your questions are paraphrased and answered as follows:

Q1. Must calcium carbide (Division 4.3, UN1402, Packing Group II), shipped as a limited quantity, display a "Dangerous When Wet" placard?

A1. No. Section 173.151(d) states that limited quantities of Division 4.3 solids in Packing Groups II and III are excepted from labeling, unless offered for transportation or transported by aircraft, specification packaging if packaged in accordance with the combination packaging provisions, and placarding requirements. The combination packaging provisions state that Division 4.3 solids in Packing Group II must be contained in inner packagings not over 0.5kg (1.1 pound) net capacity each packed in strong outer packagings.

Q2. If a shipment qualifies as a limited quantity per exceptions in 173.151(d), is it still a hazardous material?

A2. Yes.

Q3. If a shipment qualifies as a limited quantity per exceptions in 173.151(d), can it be loaded on passenger aircraft?

A3. As shown in the Hazardous Materials Table (§ 172.101), calcium carbide in Packing Group II is not forbidden from being loaded on passenger aircraft, but the net quantity per package is limited to 15 kg. Section 173.151(d) states that limited quantities of Division 4.3 solids in Packing Groups II and III are excepted from labeling as long as it is not offered for transportation or transported by aircraft. This



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173.151

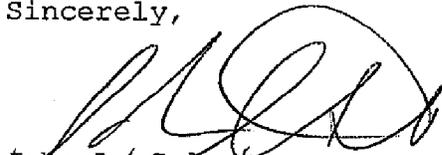
language does not preclude the material from being loaded on passenger aircraft, but it does require that if the material is being offered for transportation or transported by air that it comply with the appropriate labeling requirements for Division 4.3 Packing Group II materials. In addition, the packaging requirements specified in 173.27 apply to shipment by aircraft.

Q4. What, if any, requirements are there for labeling the internal package?

A4. The required labels and markings must be displayed on the outside of the package.

I hope this satisfies your request.

Sincerely,

A handwritten signature in dark ink, appearing to read 'John A. Gale', is written over the typed name below.

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



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BAH
§172.101
§173.151
Exceptions
03-0179

8 July 2003

Interpretation Request

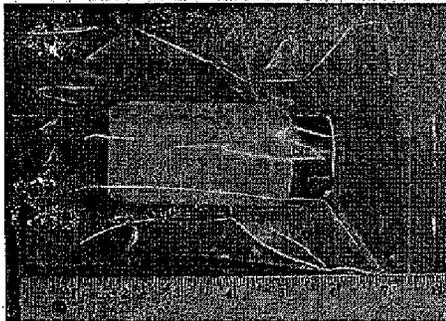
Department of Transportation
Attn: Director - Office of Hazmat Standards
RSPA
400 7th St. S.W.
Washington, DC 20590

Dear Director,

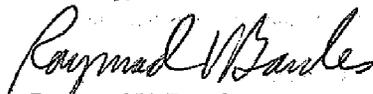
I have researched this mater on the DOT web site and have come to these conclusions regarding shipping calcium carbide. Would you be so kind as to confirm or deny my findings?

- 1.) Calcium carbide (dangerous when wet) in packaging group II, not weighing over 0.5kg, per exceptions listed in paragraph "D" of section 173.151, does not have to be labeled with the "dangerous when wet" placard?
- 2.) When the shipment qualifies as described in the first statement, is it still a hazardous material?
- 3.) When the shipment qualifies as described in the first statement, can it be loaded on passenger aircraft?
- 4.) What, if any, requirements are there for labeling the internal package?

We would like to ship approximately 4 ounces of the material in a plastic (hdpe) bottle with a screw lid that has a foam gasket. Additionally we would tape the cap to prevent it from unscrewing and this would all be placed in a zip-lock bag.



Sincerely,


Raymond V. Brandes

Phone: 850-482-7562 Email: ryb@ray-vin.com