



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

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Mr. Eric-Michael Deschenes, PE
Ultragen
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2117 Fernand-Lafontaine
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Canada

Ref No. 04-0229

Dear Mr. Deschenes:

This is in response to your September 29, 2004 letter requesting clarification on an appropriate test method under § 173.121 to determine the packing group of a flammable liquid under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask which test method must be used to determine the initial boiling point of a flammable liquid.

The HMR do not specify a particular test method. Therefore, any test method that can accurately determine the initial boiling point of a flammable liquid may be used to determine the packing group under § 173.121(a). The Organization for Economic Cooperation and Development (OECD) Guideline for the Testing of Chemicals, No. 103 "Boiling Point" outlines seven possible test methods for determining boiling point of a liquid.

I hope this information is helpful. Please contact us if you require additional assistance.

Sincerely,

Hattie L. Mitchell
Chief, Regulatory Review and Reinvention
Office of Hazardous Materials Standards



040229

173.121



CONSULTANT AU SERVICE DE LA PÉTROCHIMIE

Pollack
§ 173.121
Applicability
04-0229

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Longueuil, September 29th, 2004

Edward Mazzullo
Director, Office of Hazardous Materials Standards
US DOT/RSPA (DHM-10)
400 7th Street SW
Washington DC, 20590-0001

OBJECT : INTERPRETATION OF CFR 49 173.121

Mr. Mazzullo,

I have tried (to no avail) to find a definition or a reference to a standard test method for determining the Initial Boiling Point (or IBP) of a flammable liquid according to 49 CFR 173.121. This criterion, along with the Flash Point, is used in assessing the packing group of Class 3 flammable liquids. Although the definition of Flash Point is made quite clear in the regulations, that of the initial boiling point is left to interpretation. Could you please provide the test method which is implicitly referred to in defining the cut-point between packing groups I and II (namely $IBP < 95F$ for group I and $> 95F$ for group II).

Many thanks for the anticipated clarification,

Best regards,



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