



U.S. Department  
of Transportation

Pipeline and  
Hazardous Materials Safety  
Administration

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

JUL 18 2005

Ref. No. 04-0096

Mr. Kevin Anderson  
Manager  
Technical Services  
Chemical Lime Company  
3724 Hulen Street  
Ft. Worth, Texas 76107

Dear Mr. Anderson:

This responds to your letter requesting assistance in classifying a chemical mixture for transportation by aircraft under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask whether a mixture of calcium-magnesium oxide meets the definition of a corrosive solid under the HMR and, if so, what would be the most appropriate shipping description for the material. I apologize for the delay in responding and any inconvenience it may have caused.

Under § 173.22 of the HMR, it is a shipper's responsibility to properly classify a hazardous material. This Office does not normally perform that function. Further, we do not have the capability to determine the corrosivity of an unlisted material, such as a mixture, without the results of tests conducted on the material as specified in §§ 173.136 and 173.137. If you are not able to perform corrosivity testing on your material, we recommend that you contact a laboratory capable of performing such testing. The American Society for Testing and Materials (ASTM) maintains an internet website that offers a directory of laboratories that can satisfy this requirement. The ASTM website can be found at: [www.astm.org](http://www.astm.org).

I trust this satisfies your inquiry. Please contact us if we can be of further assistance.

Sincerely,

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



040096

172.101  
173.22

5/73.22 Stevens  
§ 172.101  
Classification

**INFOCNTR**

04-0096

**From:** Kevin.Anderson@Chemicallime.com  
**Sent:** Wednesday, April 14, 2004 5:36 PM  
**To:** INFOCNTR  
**Cc:** Linda.Cannon@Chemicallime.com; Kevin.Ingram@Chemicallime.com;  
Fred.Huege@Chemicallime.com; Mark.Johnson@Chemicallime.com  
**Subject:** Air shipment of Ca-MgO

To whom it may concern,

I would like an "informal response" as well as a "formal interpretation" for the following concern. What is the proper way to ship (labelling, Proper Shipping Name to use, etc.) Calcium-Magnesium Oxide, aka dolomitic quicklime by air. This product is produced by the calcination of Dolomite (CaCO<sub>3</sub>-MgCO<sub>3</sub>), to a resulting form CaO-MgO. In the final form CaO represents more than 50% of the product. This material (CaO-MgO) is not listed as a regulated material in the 49 CFR. I called the RSPA 1-800 number today and spoke with a gentleman named Kurt. He suggested we use the following description:

Proper Shipping Name- Calcium Oxide, Mixture      Would this be considered a misrepresentation or mislabeling of our product  
Class- 8 (Corrosive)  
UN1910  
Packing Group- III

I'm not sure who this will be directed to, but I hope it will find it's way to Edward Mazzullo.

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