



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

NOV 8 2005

Mr. Alvin Char
Department of the Army
Headquarters, United States Army Garrison, Hawaii
Schofield Barracks, Hawaii 96857-5000

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

Ref. No. 05-0119

Dear Mr. Char:

This is in response to your letter requesting clarification of the requirements under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the transportation of 100 percent methyl bromide liquid. Specifically, you asked whether "Toxic liquids, corrosive, organic, n.o.s. (methyl bromide) inhalation hazard, PG I, Zone B, 6.1, UN2927 (6.1, 8)" is an appropriate basic description for your material. You also asked whether you must apply for an exemption to transport the methyl bromide liquid in the packagings as described in your letter.

As a member of my staff explained in a telephone conversation to Mr. Gary Akasaki of your staff, methyl bromide is not correctly classified as a Division 6.1 (poisonous/toxic) material and, therefore, UN2927 is not a correct assignment. Methyl bromide meets the defining criteria in § 173.115 for a Division 2.3 (gas poisonous/toxic by inhalation) material. Based on the information contained in your letter, "Methyl bromide, 2.3, UN1062" is the most appropriate basic description and § 173.193 is the correct packaging authorization section for your material; therefore, the packagings, as described in your letter, are not authorized for methyl bromide.

With regard to the use of packagings not authorized under § 173.193, as explained to Mr. Akasaki, you may wish to apply for an exemption (special permit) through the Department of Transportation's Exemptions and Approvals Office at 202/366-4535.

I hope this information is helpful. Please contact this office should you have additional questions.

Sincerely,

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



050119

173-22



REPLY TO ATTENTION OF

DEPARTMENT OF THE ARMY
HEADQUARTERS, UNITED STATES ARMY GARRISON, HAWAII
SCHOFIELD BARRACKS, HAWAII 96857-5000

MAY 11 2005

McIntyre
§ 173.22
Classification
05-0119

5/17/05

Directorate of Public Works

Mr. Edward Mazzullo
Office of Hazardous Materials Standards
Research and Special Programs Administration
Attn: DHM-10
U.S. Department of Transportation
400 7th Street SW
Washington, District of Columbia 20590-0001

OPTIONAL FORM 99 (7-99)

FAX TRANSMITTAL

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To	JERICA/JENNIFER	From	GIANNI AVASAKI
Dept./Agency	DOT	Phone #	(888) 674-2878
Fax #	(202) 366-3012	Fax #	(888) 656-1039

NSN 7540-01-317-7368 5099-101 GENERAL SERVICES ADMINISTRATION

Dear Mr. Mazzullo:

We have contacted your office on several occasions regarding the proper DOT packaging for the transportation of 100% Methyl Bromide Liquid (MBL) contained in glass vials, to a Treatment, Storage, and Disposal Facility on continental United States for disposal. Initial directive from the DOT Hazardous Materials Information Center was to ship the MBL under the proper shipping name (PSN), Methyl Bromide, 2.3, UN1062. However, the MBL in its original packaging is a sealed glass vial (see pictures at the enclosure). The temperatures of the MBL varied from 76 degrees Fahrenheit (F) to 77 degrees F (see pictures at the enclosure) and cannot meet the packaging paragraphs referenced in 173.193 as a liquefied poisonous gas in cylinders since the temperatures were above 68 degrees F. The MBL is a corrosive and does not contain 14.7 pounds per square inch of pressure in each vial.

Since there is no separate entry in the Hazardous Materials Table for the MBL it seems that the most accurate PSN is Toxic, liquids, corrosive, organic, n.o.s. (Methyl Bromide) Inhalation Hazard, Packing Group I, Zone B, 6.1, UN2927, (6.1, 8).

- Product Description:

The hazardous material is sealed in glass vials ¾ filled with 100% MBL. The vials are approximately 5 ½ inches in length and ¼ inch in diameter. In the 1940's Abbott Laboratories, MERCK & Company, and Tedlee Company manufactured the MBL and distributed the pesticide commercially, however, these companies are no longer in business.

- Current Packaging Configuration:

There are a total of 101 MBL vials stored in 3 open head drums. Specific packaging configuration follows:

- **Drum #1** (1) each 55 gallon drum, open head steel X-rated drum (UN1A2/X400/S/UN1A2/Y1.5/150/USA/SDCC), 99 LBS, containing (2) each 10 gallon open head Y-rated drums (UN1A2/Y43/S/004/USA/M4723) with cushioning absorbent pads (drums 1AA and 1AB).

- Drum #1AA contains (30) MBL vials individually packaged in 2 plastic ziploc bags placed into a cardboard tube (1/8 " thickness, @ 8"L x 1.75"Diameter(D)) with plastic end caps. The (30) each cardboard tubes are placed into the 10 gallon open head drum with vermiculite.

- Drum #1AB contains (29) MBL vials individually packaged in 2 plastic ziploc bags placed into a cardboard tube (1/8 " thickness, @ 8"L x 1.75"D) with plastic end caps. The (29) each cardboard tubes are placed into the 10 gallon open head drum with vermiculite.

- **Drum #2** (1) each 20 gallon open head steel X-rated drum (UN1A2/X400/S&A/Y1.4/150/USA/GBC10/35703), 52 LBS., containing (1) each 10 gallon open head Y-rated drum (UN1A2/Y42/S/04/USA/M4723) cushioned with vermiculite (drum 2AA).

- Drum #2AA contains (28) MBL vials individually packaged in 2 plastic ziploc bags placed into a cardboard tube (1/8" thickness, @ 8"L x 1.75"D) with plastic end caps. The (28) each cardboard tubes are placed into the 10 gallon open head drum with vermiculite.

- **Drum #3** (1) each 10 gallon open head steel X-rated drum (UN1A2/Y1.2/100/03/USA/M4035/UN1A2/X100/S/03/USA/M4035), 29 LBS., containing (1) each 5 gallon open head plastic Y-rated drum (UN1H2/Y25/S/03/USA+AA2492) cushioned with vermiculite (drum 3AA).

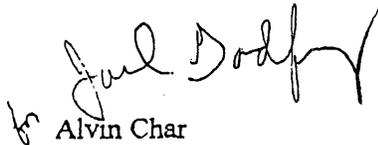
- Drum #3AA contains (13) each MBL glass vials packaged in a canvas bag (cushioning material) placed into cardboard boxes and placed into a sealed plastic bag. In addition, (1) each glass vial is individually packaged in 2 plastic ziploc bags placed into a cardboard tube (1/8" thickness, @8"H x 1.75"W) with plastic end caps. The containers are placed into the 5 gallon open head Y-rated plastic drum with vermiculite (see pictures at the enclosure).

- **Questions:**

- Can the MBL be transported using the PSN Toxic liquids, corrosive, organic, n.o.s. (Methyl Bromide) Inhalation Hazard, Packing Group I, Zone B, 6.1, UN2927, (6.1, 8)?
- Does the current packaging configuration meet DOT specifications?
- Is a DOT Exemption required to ship the MBL?

This memorandum will be forwarded to you via electronic mail, fax, and U.S Postal Service. Your expeditious review and comment is greatly appreciated. If you have any questions please contact Mr. Gary Akasaki/Mr. Fabian Kahiamoe, Environmental Division at 656-2878X1022/656-2878X1023 respectively.

Sincerely,



Alvin Char
Chief, Environmental Division
Directorate of Public Works

Enclosures

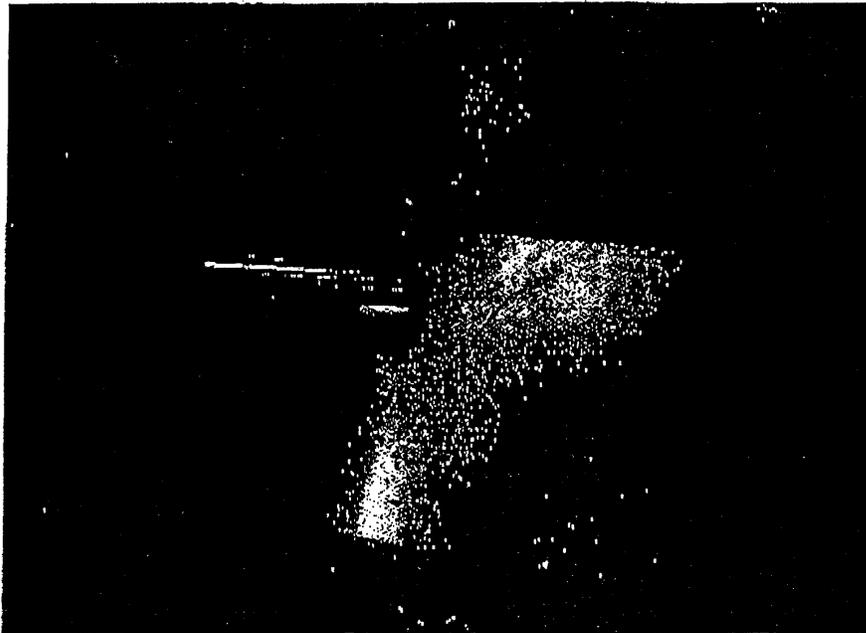


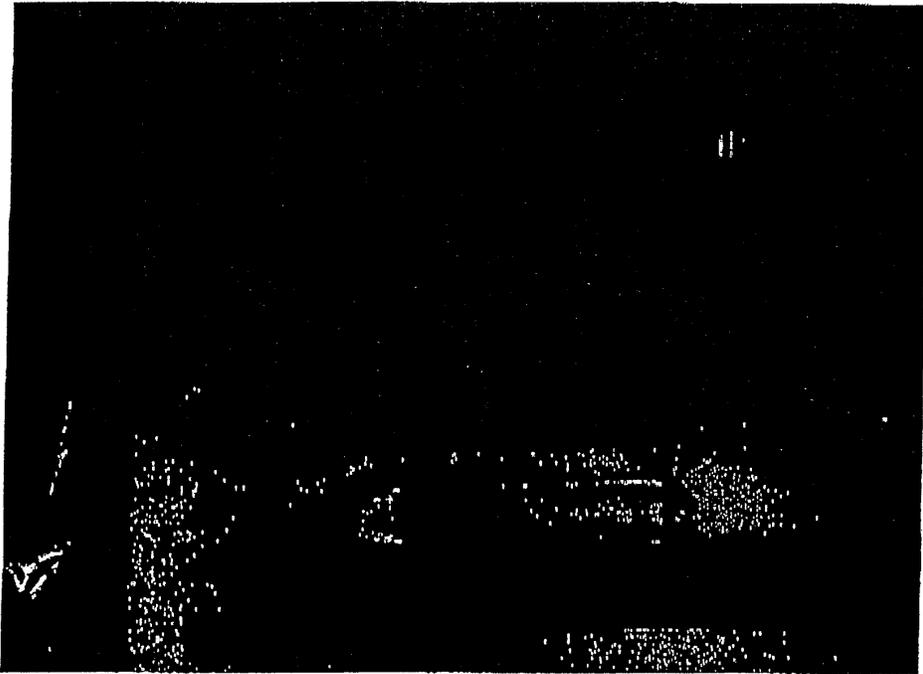
Temperature readings of MBL



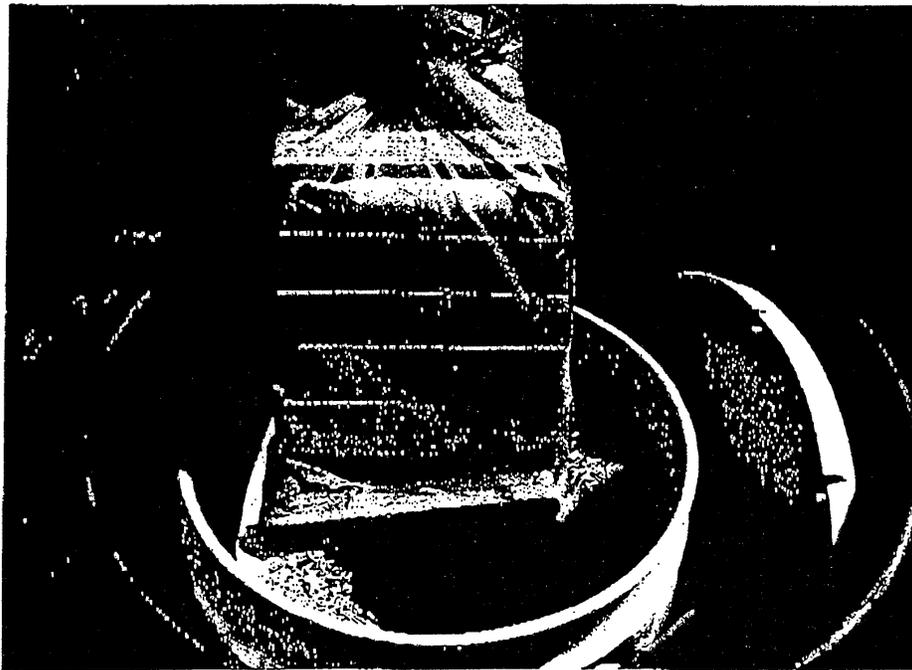


Temperature readings of MBL

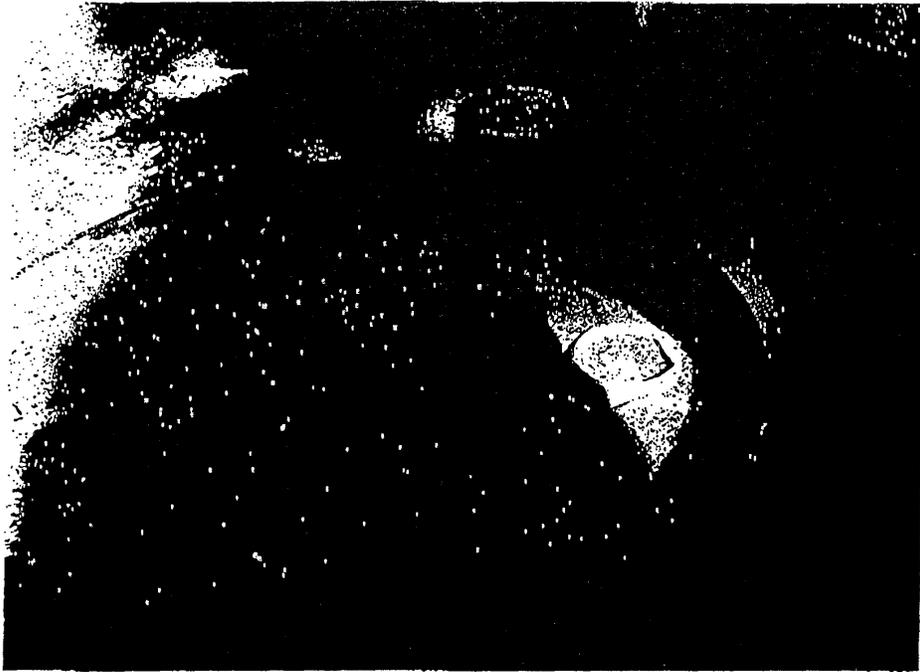




Inner canvas bag and outer box



Drum #3



10 gallon open head inner Y rated drum



3 each X rated open head outer drums