



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

MAY 30 2006

Mr. John Classic
Buckeye Fire Equipment Company
110 Kings Road
Kings Mountain, NC 28086

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

Reference No.: 06-0101

Dear Mr. Classic:

This responds to your request concerning your company's line of restaurant kitchen fire suppression systems. One of the system components is a 4BW cylinder containing potassium carbonate and pressurized with nitrogen to 195 psi. The filled cylinder is packaged and transported as a separate component. You ask if "Nitrogen, compressed, mixture, UN 1066" is the correct shipping name and identification number under the Hazardous Materials Regulations (HMR; 49 CFR, Parts 171-180).

The answer is yes, the proper shipping description for the component is "Nitrogen, compressed, mixture, 2.2, UN 1066." The potassium carbonate is not a regulated material and is not subject to the HMR. The cylinder must be marked, labeled and packaged as prescribed. You may not take advantage of the exceptions in § 173.309 because the 4BW cylinder is not equipped to function as a fire extinguisher.

I trust this satisfies your request.

Sincerely,

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



060101

172.101
173.309

Edward Mazzullo
Director
Office of Hazardous Materials Standards

Corbin
§172.101
Proper Shipping Name
April 28, 2006
06-0101

Dear Mr. Mazzullo,

The Buckeye Fire Equipment Company has developed a product line of restaurant kitchen fire suppression systems. One of the components of the system is a 4BW tank containing potassium carbonate and pressurized with nitrogen to 195 psi. This tank will be shipped charged and pressurized as a separate component in its own shipping container (corrugated box).

The question posed to Ms. Hatti Mitchell was what is the UN number and proper shipping name that should be used? Her reply was that since the component could not be used as a fire extinguisher in the configuration in which it is shipped, the most appropriate identification would be UN 1066 Nitrogen, Compressed, Mixture.

Ms. Mitchell suggested that getting written confirmation from your office that UN 1066 is the proper identification would preclude any future questions D.O.T. personnel may have in regards to the correctness of the UN number.

Should you have any questions about this matter, please direct them to the undersigned. Thank you for your assistance.

John Classic
Buckeye Fire Equipment Company

Ph: 704.739.7415
Email: techservice@buckeyef.com

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Kings Mountain, NC, 28086