



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

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

FEB - 5 2002

Ms. Cindy Seki  
CrossNet USA, Inc.  
59 Coburg Road  
Suite C  
Eugene, Oregon 97401

Ref. No. 02-0012

Dear Ms. Seki:

This responds to your December 7, 2001 letter requesting clarification on § 173.29(b)(2)(ii) under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if your proposed method of cleaning fuel bottles using a cleaning product, "Slix" satisfies cleaning and purging requirements in § 173.29(b)(2)(ii).

You propose to clean and purge fuel bottles that previously contained white gasoline, kerosene, diesel and regular gasoline with a liquid alkaline cleaner, "Slix", in order to satisfy requirements in § 173.29(b)(2)(ii). These fuel bottles are used by hikers and backpackers for cooking on white gasoline stoves.

For purposes of the HMR, "cleaned and purged" means no residual hazardous material or vapor remain in a container. The methods used to clean and purge a packaging are intentionally not defined because they vary greatly depending on the nature of the hazardous material and the type of packaging. In some instances, a packaging can be totally emptied of hazardous material, including residue, without undergoing a cleaning process, and may be considered "cleaned and purged". In other instances, an active cleaning process may be necessary to purge a packaging of hazardous residue. We cannot endorse a particular cleaning product or procedure for cleaning and purging. However, the procedure presented in your letter appears to meet the definition of "sufficiently cleaned of residue and purged of vapors to remove any potential hazard" provided any residue remaining in the fuel bottles no longer meets any of the hazard class definitions of the HMR.

I hope this answers your inquiry.

Sincerely,

Delmer F. Billings  
Chief, Standards Development  
Office of Hazardous Materials Standards



020012

173.29(b)(2)(ii)



# CROSSNET USA, INC.

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December 7, 2001

Edward Mazzullo  
Director, Office of Hazardous Material Standards  
US DOT/RSPA (DHM10)  
400 7<sup>th</sup> St. SW  
Washington, DC 20590-0001

Boothe  
§ 173.29(b)(2)(ii)  
Residue/  
Empty

Dear Mr. Mazzullo:

My name is Cindy Sekiguchi. I work for an import/export company that geared primarily toward the outdoor industry. I am the project coordinator for developing a product line used to clean white gasoline fuel bottles. I contacted Thomas Kenny of the FAA who directed me to you. 02-0012

This letter is to request clarification of 49CFR part 173.29(b)(2)(ii) that states: "The packaging is sufficiently cleaned of residue and purged of vapors to remove any potential hazard" as it relates specifically to white gasoline fuel bottles. These fuel bottles contain white gasoline, kerosene, diesel and regular gasoline. Hikers and backpackers use the fuel bottles for cooking on white gasoline stoves. After use, the backpacker removes all fuel, leaving behind only a small residue. We are proposing the following method of cleaning the fuel bottle:

The proposed cleaner is as follows:

- MSDS No.: 1861-411N
- Product Name: Slix
- Manufacturer: Penetone Corporation, 74 Hudson Ave., Tenafly, NJ 07670
- General Use: Degreasing (military and aircraft cleaner)
- Product Description: Liquid alkaline cleaner
- Generic Ingredients: Water, surfactants and builders (contains no hazardous materials)
- Flash Point: None to boiling

"All our dreams can come true if we have the courage to pursue them." - Walt Disney

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The proposed procedure is:

- Remove cap from aluminum fuel bottle (approx. 650 ml), pour in 1-2 oz. of cleaner, replace cap, shake bottle, pour out residue. Rinse with warm water.

Would the above procedure satisfy the regulations as stated in 49CFR part 173.29(b)(2) to sufficiently clean the fuel bottle of residue and purge it of vapors to remove any potential hazard, thereby, making the fuel bottle acceptable for passenger aircraft transportation according to the 49CFR regulations?

In order to maintain full compliance with all federal hazardous material regulations, we are requesting a written interpretation specific to the aforementioned product and purpose. I look forward to your reply.

Sincerely,

CROSSNET USA, INC.



Cindy Seki  
Information Design

Enclosure

*"All our dreams can come true if we have the courage to pursue them." - Walt Disney*

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