



U.S. Department  
of Transportation

**Research and  
Special Programs  
Administration**

DEC 16 1998

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

Ms. Sally Harnam  
Rapid Aid  
1 - 3345 Laird Road  
Mississauga, Ontario L5L 5R6

Ref. No. 98-0307

Dear Ms. Harnam:

This is in response to your letter dated October 5, 1998, requesting clarification on the marking requirements under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you are requesting confirmation that your Rapid Aid Cold Pack Instant Cold Compress packaging is properly marked.

According to your letter and enclosed inner packaging for your cold pack product, you are describing the contents as: Ammonium nitrate fertilizer crystals, NA-2072 and water. Under § 172.301 a non-bulk packaging must be marked with the proper shipping name and identification number (preceded by "UN" or "NA", as appropriate) for the material as shown in the Hazardous Materials Table in § 172.101. However, identification numbers are not required on packages which contain only limited quantities, as defined in § 171.8, or for ORM-D materials, such as consumer commodities. These required markings must be placed on the outside package, not on the inner packagings such as your plastic cold pack bags.

It is the opinion of this Office that your cold packs qualify for the limited quantity exception in § 173.152 and meet the definition of a consumer commodity. Each inner packaging may not exceed 2.2 pounds for oxidizers in Packing Group II and 11 pounds for oxidizers in Packing Group III. The gross weight of the package may not exceed 66 pounds. Therefore, your package may be marked with the proper shipping name, "Consumer Commodity", and with the ORM-D marking as specified in § 172.316.

I hope this answers your inquiry.

Sincerely,

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



1 - 3345 Laird Road  
Mississauga, Ontario  
L5L 5R6

Ph (905) 820-4788  
Fax (905) 820-9226  
E-mail  
rapidaid@wchat.on.ca

October 5, 1998

Booth e  
\$ 172.301  
98-0307

Mr. Edward Mazzullo  
US Department of Transportation  
Hazardous Materials  
400 7<sup>th</sup> S.W.  
Washington, D.C.  
20590

Dear Edward:

Rapid-Aid is a manufacturer of Instant and Reusable Hot and Cold Therapy products. Our Instant cold Pack consist of Ammonium Nitrate Fertilizer and a water ampule.

I have been in discussions with The Department of Transportation, Hazardous Materials in Washington which has advised me that the proper way of labeling our Instant Cold Compress is as follows:

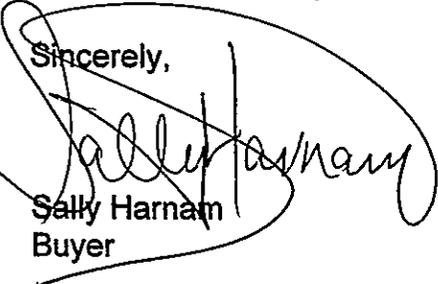
Ammonium Nitrate Fertilizer (NA-2072) and water.

Could you please provide a written confirmation if the content wording is correct.

Enclosed are two samples of our bags for your evaluation.

I greatly appreciate your assistance.

Sincerely,



Sally Harnam  
Buyer

# COLD PACK COMPRESSE FROIDE

Instant Cold Compress  
Compresses froide instantanée



For use whenever instant cold therapy is required.

**INSTRUCTIONS FOR USE:**

1. Shake granules to bottom of pouch. 2. Squeeze down from top using both hands to "pop" inner fluid bag. 3. Shake bag briefly to mix contents. 4. Wrap in soft cloth and apply.

**CAUTION:** For single use only; discard after using. Do not attempt to reuse this product by freezing as frostbite may result.

**WARNING:** For external use only. Harmful if swallowed. If accidentally swallowed, give several glasses of water, call your Local Poison Control Center immediately. Do not puncture bag. Should contents become exposed to skin or eyes, flood with water immediately and call a physician. Keep out of reach of children.

**CONTENTS:** Ammonium nitrate fertilizer crystals, NA-2072 and water.

**STORAGE:** Keep away from extreme heat and open flame. Store at room temperature.

Pour le traitement à froid instantané

**MODE D'EMPLOI:**

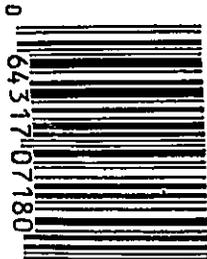
1. Chasser les granules vers le bas du sac en le secouant. 2. Exercer une pression des deux mains du haut vers le bas pour faire «cliquer» la poche de fluide intérieure. 3. Secouer brièvement le sac pour mélanger son contenu. 4. Envelopper d'un tissu doux et appliquer.

**PRÉCAUTIONS:** À utiliser une seule fois; jeter après utilisation. Ne pas essayer de réutiliser ce produit en le congelant car la gelure peut en résulter.

**AVERTISSEMENT:** Usage externe seulement. Nocif en cas d'ingestion. En cas d'ingestion accidentelle, faire boire plusieurs verres d'eau et appeler immédiatement le centre antipoisons. Ne pas perforer le sac. Au cas où le contenu entre en contact avec la peau ou les yeux, rincer à grande eau immédiatement et appeler un médecin. Tenir hors de portée des enfants.

**CONTENTS:** Cristaux d'engrais de nitrate d'ammonium, NA-2072 et eau.

**CONSERVATION:** Éloigner de la chaleur extrême et la flamme nue. Entreposer à la température ambiante.



Lot #6708-8

**RAPID  
AID**



MADE IN CANADA BY RAPID-AID LTD.  
MISSISSAUGA, ONTARIO, CANADA L4L 5R6  
FABRIQUÉ AU CANADA PAR RAPID-AID LTD.  
MISSISSAUGA (ONTARIO) CANADA L4L 5R6

**COLD PACK  
COMPRESSE FROIDE**

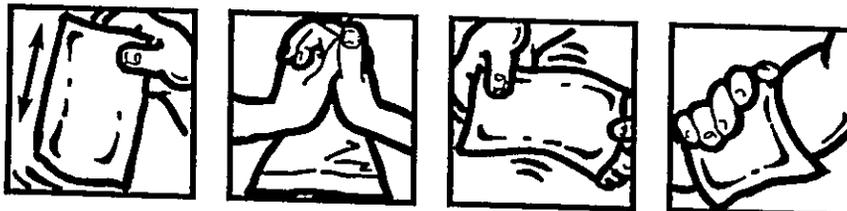
**Instant  
Gold  
Compress  
Compress  
froide  
instantanée**

Cat. #718

**RAPID  
AID**

# COLD PACK

## Instant Cold Compress



For use whenever instant cold therapy is required.

### **INSTRUCTIONS FOR USE:**

**1.** Shake granules to bottom of pouch. **2.** Squeeze down from top using both hands to "pop" inner fluid bag. **3.** Shake bag briefly to mix contents. **4.** Wrap in soft cloth and apply.

**CAUTION:** For single use only; discard after using. Do not attempt to reuse this product by freezing as frostbite may result.

**WARNING:** For external use only. Harmful if swallowed. If accidentally swallowed, give several glasses of water, call your local Poison Control Centre immediately. Do not puncture bag. Should contents become exposed to skin or eyes, flood with water immediately and call a physician. Keep out of reach of children.

**CONTENTS:** Ammonium nitrate fertilizer crystals, NA-2072 and water.

**STORAGE:** Keep away from extreme heat and open flame. Store at room temperature.



Lot #6709-8

# **RAPID+**

# **AID**

CE

MADE IN CANADA BY RAPID-AID LTD.  
MISSISSAUGA, ONTARIO, CANADA L5L 5R6

# **COLD PACK**

**Instant  
Cold  
Compress**

**Cat. #7151**

**RAPID+  
AID™**