



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

JUN 1 2001

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

Dr. Shuojia Dong
DenPlus Inc.
4235 Beaconsfield
Montréal, Québec
CANADA, H4A 2H4

Ref. No. 01-0124

Dear Dr. Dong:

This is in response to your letter dated May 8, 2001, requesting clarification on the use of the limited quantity exceptions in the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). You state you are shipping packages of dental acrylic monomer under the description "Methyl methacrylate monomer, inhibited, 3, UN1247, PG II." Specifically, you request confirmation of your understanding of the limited quantity provision (§ 173.150) specified for this entry in column 8A of the Hazardous Materials Table (§ 172.101).

You are correct in your understanding of the limited quantity exceptions for Class 3 (flammable liquids) as provided in § 173.150. Flammable liquids in Packing Group II may be packed in inner packagings not over 1.0 L net capacity each, packed in strong outer packagings. The limited quantity provisions for Class 3 materials in § 173.150 authorize exceptions from labeling (except when transported by air), placarding, and from specification packaging requirements when packaged in combination packagings according to provisions in § 173.150(b). Each package must conform to general packaging requirements in Part 173, Subpart B, and may not exceed 30 kg gross weight.

Each person who offers for transportation a hazardous material in a non-bulk packaging shall mark the package with the proper shipping name and identification number for the material as shown in the Hazardous Materials Table (§ 172.301(a)). Under § 172.312(c), package orientation markings are not required on packages containing flammable liquids in inner packagings of 1.0 L or less prepared in accordance with § 173.150(b) or (c), except when offered or intended for transportation by aircraft.



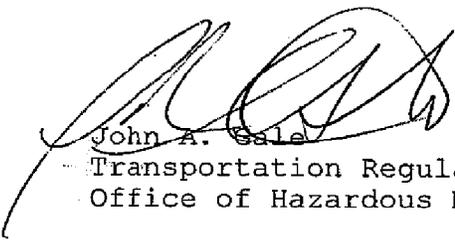
010124

173.150

The shipping paper you provided is not in accordance with the requirements of Part 172, Subpart C. The shipping description of a hazardous material on the shipping paper must include the proper shipping name, hazard class, identification number, and packing group prescribed for the material in the Hazardous Materials Table, with no additional information interspersed (§ 172.202). For example: "Methyl methacrylate monomer, inhibited, 3, UN1247, PG II." The total quantity (by net or gross mass, capacity, or as otherwise appropriate), including the unit of measurement, of the hazardous material covered by the description must be shown either before or after the basic description. The description for a material offered for transportation as "limited quantity," as authorized by the HMR, must include the words "Limited Quantity" or "Ltd Qty" following the basic description (§ 172.203(b)). The required shipping description on a shipping paper and all copies thereof used for transportation purposes, must be legible and printed in English (§ 172.201(a)(2)).

I hope this satisfies your request.

Sincerely,



John A. Gale

Transportation Regulations Specialist
Office of Hazardous Materials Standards



McIntyre
§ 173.150
Packaging
01-0124

Mr. Edward T. Mazzullo
Director, Office of Hazardous Materials Standards
U.S. DOT/RSPA (DHM-10)
400 7th Street S.W.
Washington, D.C. 20590-0001

May 8th, 2001

Dear Mr. Mazzullo,

Could you please let us know if our following shipping procedure to/within US conforms to the requirements of CFR49 .

Hazard Material Description:

Material: Dental acrylic monomer
Shipping name: Methylmethacrylate monomer inhibited
UN number: 1247
Hazard Class: 3
Packaging group: II
Packaging exception: 173.150

Packaging Description:

Inner packaging (Hazard): 1 L (maximum) in metal can
wrapped in PE bag and further protected with PE bubble sheet.

Outer packaging 1: Fiberboard box withstand 65 lb. gross weight contains
1 inner packaging (hazard) and 5 lb PMMA (non hazard)
Cushioned with PS loose fill.
Gross weight = 4.5 kg
Total hazard material: 1L

Outer packaging 2: Fiberboard box withstand 65 lb. gross weight
contains maximum 4 outer packaging 1.
Cushioned with PS loose fill.
Gross weight = 18 kg
Total Hazard material: 4 x 1L

DENPLUS inc., 4235 Beaconsfield, Montréal, Québec, Canada, H4A 2H4
(514) 488-7156 • 1-888-344-4424 • Fax: (514) 484-9866

Labeling and Shipping Documents

Labeling: see attached page 1.
Shipping documents: packing slip (see sample on page 2).

Exceptional situations:

Could we apply the article 173.150 to the following situations:

- 1) Outer packaging: Fiberboard box withstand gross weight 65 lb.
contains up to 16 x inner packaging I
Total hazard material = 16 x 1L = 16 L
Gross weight = 18 kg

- 2) On pallet: Up to 64 x Outer packaging I
Total hazard material = 64 x 1L (kg)
Gross weight = 300 kg

I would appreciate very much your earlier assistance. Thank you for your attention.

Best Regards,

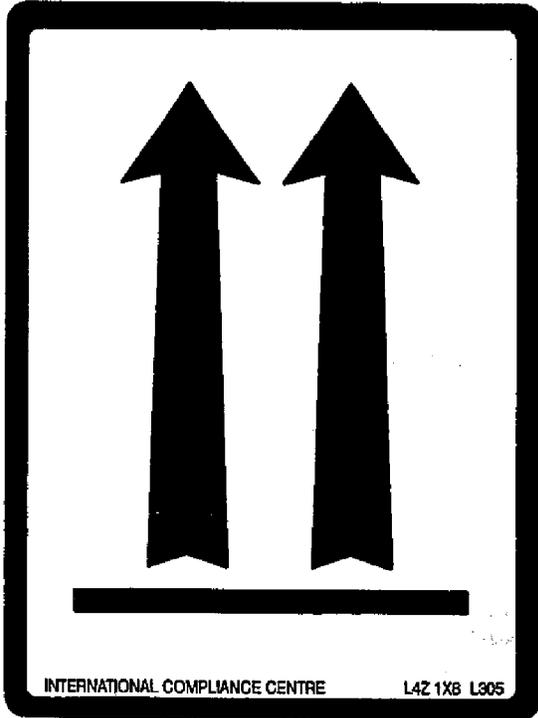


Shuojia Dong, Ph. D
Phone: 450-646-1330
Fax: 450-646-1350
e-mail: shuojia@denplus.com



attached page 1

Outer Packaging Labelings



Methyl methacrylate monomer
inhibited (limited quantity)
Méthacrylate de méthyle monomère
stabilisé (quantité limitée)