



U.S. Department  
of Transportation

**Research and  
Special Programs  
Administration**

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

APR 20 2000

Ref. No. 00-0044

Mr. David M. Stone  
President  
Photographic Solutions, Inc.  
P.O. Box 135  
Onset, MA 02558

Dear Mr. Stone:

This is in response to your letter and subsequent telephone conversation with a member of my staff requesting clarification of the small quantity exceptions under 49 CFR 173.4. Specifically, you ask whether .8 ml of "Methanol" contained in a hollow plastic handle which serves as a cleaning swab may be transported under the provisions of § 173.4. You state that the handle is covered with a sponge material and overwrapped with a soft poly fiber material. You further state that both of these materials would fully absorb the contents of the handle. The package is then heat sealed with a one mil poly bag and is placed in a strong outside package with a camera.

A package may be transported under the small quantity exceptions if the material is prepared in accordance with the quantity limits and packaging requirements in § 173.4. Based on the information you submitted, we concur that your package may be transported under the small quantity exceptions, provided all other provisions in § 173.4 are met. The packing of a nonhazardous material in the same package is permitted provided there is no violation of § 173.21.

I hope this information is helpful. Please contact this office if you need additional assistance.

Sincerely,

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



000044

# PHOTOGRAPHIC SOLUTIONS, INC.

Edward Mazzullo  
Director, Office of Hazardous Materials Standards  
US Dept. of Transportation / RSPA  
400 7<sup>th</sup> Street SW  
Washington, DC 20590

24 JAN 2000

*McIntyre*  
*\$173.4*  
*00-0044*

Dear Mr. Mazzullo,

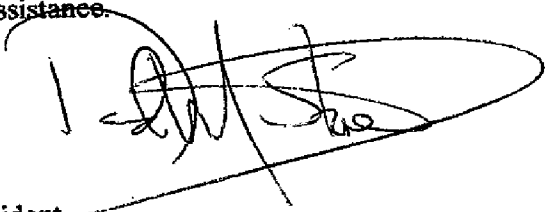
We intend to have manufactured, a cleaning swab with a hollow plastic handle. This handle will be filled with .8 ml of methanol which will be contained within the handle. Only with a precisely applied pressure on the handle, can the liquid flow to the end of the handle which is covered with a sponge material overwrapped with a soft poly fiber material. Either the sponge or the overwrap of poly would fully absorb the contents of the tube. The entire unit is also completely heat sealed within a 1 mil poly bag.

I am writing to confirm that this product would be exempt from CFR hazardous shipping requirements, for both surface and air, under the small quantity exemption of at least 49CFR173.4(a)(1)(i) or other applicable sections.

Could you please provide me with an assessment of whether or not this item, as described and packaged would indeed be exempt from regulation when offered for either air or ground transportation.

Thank-you for your assistance.

Sincerely,

  
David M. Stone, President  
PHOTOGRAPHIC SOLUTIONS, INC.

P.O.Box 135  
Onset, MA 02558-0135

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*SUTER PLC*  
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