



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

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

NOV 16 2001

Mr. J. Keith Connelly
Chemical Hygiene Officer NTP Archives
National Toxicology Program Archives
P.O. Box 13566
Research Triangle Park, NC 27709

Ref. No. 01-0245

Dear Mr. Connelly:

This responds to your September 14, 2001 letter and subsequent telephone conversation with me asking whether the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) apply to a rail or motor vehicle shipment of non-infectious rodent tissue transported with a 70% ethyl alcohol solution (flashpoint of 40°F). The specimen and 50 ml of ethyl alcohol are in a 4 ½ ml-thick, heat-sealed polyethylene bag that is packed in another heat-sealed polyethylene bag and placed with about 60 additional specimens prepared in the same manner inside of a non-specification fiberboard box. Each box will contain approximately 3 L (.8 gallon) of ethyl alcohol and weigh less than 30 kg (66 pounds).

Non-infectious animal tissue is not regulated under the HMR. However, the ethyl alcohol solution is regulated as a Class 3 (flammable) material with the shipping description "Ethyl alcohol, 3, UN 1170, PG II." A Class 3 material may be transported as a limited quantity in conformance with the provisions of § 173.150(b) of the HMR. A specification packaging is not required for a shipment of a limited quantity. From your description, it appears that the packaging you propose for shipment of the specimens conforms to the provisions of the § 173.150(b) and, thus, may be used to transport the ethyl alcohol solution as a limited quantity.

A shipping paper that meets the requirements contained in Part 172, Subpart C, must accompany the package and include the text "Limited Quantity" or "Ltd Qty" after the basic description. The text "Ethyl alcohol" and other applicable information must be marked on the package as prescribed in Part 172, Subpart D. Further, any employee performing a function that affects the



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173.134(a)(2)

safety of this package in transportation must receive HMR training (see Part 172, Subpart H). Packages prepared according to the requirements in § 173.150(b) are excepted from the HMR's labeling and placarding requirements.

I hope this information is helpful.

Sincerely,



John A. Gale

Transportation Regulations Specialist
Office of Hazardous Materials Standards

EPL[®]

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Edmonson
§ 173.134 (a) (2)
Diagnostic Specimen
01-0245

09/14/01

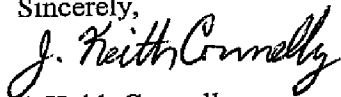
Office of Hazardous Materials Standards (DHM-10)
Research and Special Programs Administration
U.S. Department of Transportation
400 7th Street SW.
Washington DC, 20590-0001

Dear Sir,

A subcontractor is planning to ship residual rodent tissue specimens to the National Toxicology Program's Archives. Each animals' tissues are stored in a heat sealed 4½ mil polyester bag with approximately 50 ml of 70% ethyl alcohol (flash point 40 °F). This is then placed in another heat sealed bag. Approximately 60 specimens are then placed in a large plastic bag within a 15"x18"x7½" 350 lb. test doubled-walled corrugated cardboard box. Each box contains approximately 3 liters of alcohol.

Are there any special requirements (i.e. 4G box according to one subcontractor) for sending these materials interstate ground, or can the specimens be sent in a standard 15"x18"x7½" cardboard box?

Sincerely,



J. Keith Connelly
Chemical Hygiene Officer NTP Archives