



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

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

MAY 17 2002

Mr. Andrew Stockford
Managing Director
Quay Equestrian Limited
St. George's Quay
Lancaster, England LA1 5QJ

Ref. No. 01-0303

Dear Mr. Stockford:

This is in response to your communications concerning the transportation of your company's soap product as a consumer commodity under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask whether your product, transported as "Consumer commodity, ORM-D," is packaged, marked and labeled in accordance with the HMR for transportation by highway.

The material safety data sheet you provided describes the soap product as "Flammable liquid, n.o.s. (contains Methylated spirits), 3, UN1987, PG III." According to Mr. John Nunn of your company, the packagings are shipped into the United States, meet the definition in § 171.8 for a consumer commodity, and are repackaged for shipment as follows:

- Inner packaging:** a non-specification, polyethylene bottle 500 ml, 750 ml, or 2.5 gallons in size equipped with a pump dispenser (depending on the size, as many as 12 inner packagings will be placed in one outer packaging)
- Outer packaging:** a strong non-specification fiberboard box
- Marking:** one side or end with "Consumer commodity, ORM-D"
- Labeling:** none

Based on the information you provided, when your product is being repackaged for transportation in accordance with the HMR, the 500 ml and 750 ml inner packagings may be transported as "Consumer commodity, ORM-D" provided each strong outer packaging does not exceed 66 lbs. You are correct in your understanding that the packagings must be marked on at least one side or end with "Consumer commodity, ORM-D" and that the packagings are excepted from the labeling requirements. In addition, shipments of ORM-D materials are not subject to the shipping paper requirements of the HMR unless the material meets the definition of a hazardous substance, hazardous waste or marine pollutant, or is offered for transportation by aircraft.



010303

173.150

With regard to your 2.5 gallon inner packagings, as provided in § 173.150, PG III inner packagings must not exceed 5.0 L (1.3 gallons) net capacity each to meet the limited quantity exceptions. The 2.5 gallon inner packagings, therefore, may not be transported as "Consumer commodity, ORM-D." Appropriate shipping descriptions for the 2.5 gallon inner packagings (see § 172.101(c)(12)(ii)) would be:

"Flammable liquid, n.o.s. (Alcohol), 3, UN1993, PG III,"
"Flammable liquid, n.o.s. (Ethanol, Methanol), 3, UN1993, PG III,"
"Alcohols, n.o.s. (Alcohol), 3, UN1987, PG III," or
"Alcohols, n.o.s. (Ethanol, Methanol), 3, UN1987, PG III."

The 2.5 gallon inner packagings must be packaged in accordance with § 173.203 as designated in Column (7) for the above shipping descriptions. These packagings must be marked with the proper shipping name and ID number, and display the FLAMMABLE LIQUID label.

I hope this information is helpful.

Sincerely,



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

cc: Mr. John Nunn
Nunn Finer Products
2825 Northeast Road
Northeast, MD 21917

Edmondson
\$173.150
Exceptions



QUAY EQUESTRIAN LIMITED

St George's Quay, Lancaster, LA1 5QJ, England
Tel: +44 (0) 1524 381821 Fax: +44 (0) 1524 32080
Email: horses@quayequestrian.com
Website: www.quayequestrian.com

DATE 19 November 2001

NO OF PAGES (inc this one) 7

FOR THE ATTENTION OF

Eileen Edmondson / Transportation Regulations
Specialist

PLEASE REPLY TO

Andrew Stockford

OUR NUMBER 0044 1524 32080

YOUR NUMBER 001 202 366 3012

Dear Eileen

Further to our recent telephone conversation, I enclose a copy of our original fax dated 28 August 2001. You requested further information detailed in an email of 21 September.

In answer to these questions

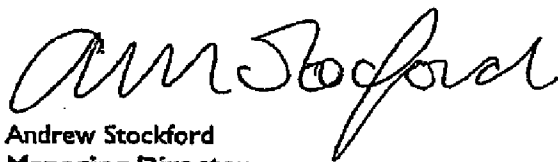
1. The inclusion of alcohols N.O.S is an error. The description should just be " Consumer Commodity ORM-D".
2. Attached
3. We no longer require classification on this product.
4. As above
5. The Belvoir Spray Soap is in a pump dispenser. It means the requirements of 49 CFR 173.150. It is class 3, packing group III. It is packed in containers of 500ml + 750ml each enclosed in a strong corrugated outer.
6. As 3



- 7. Products are shipped to the US in accordance with IMDG / IATA regulations in corrugated outer, which are then palletised and stretch wrapped. Once in the US so far as we are aware our customer is shipping products according to US domestic regulations. All products will be dispatched at least in corrugated outers.
- 8. The product was incorrectly labelled.

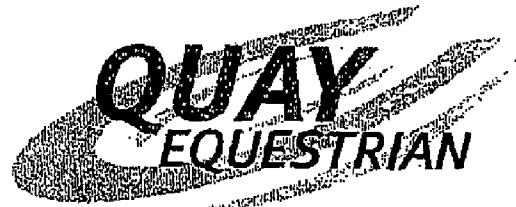
Can you please confirm the correct labelling of this product to ensure we comply with the relevant regulations.

Yours sincerely



Andrew Stockford
Managing Director





QUAY EQUESTRIAN LIMITED
St George's Quay, Lancaster, LA1 5QJ, England
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Website: www.quayequestrian.com

DATE	28 August 2001	NO OF PAGES (inc this one)	
FOR THE ATTENTION OF		Edward Mazzullo/US Hazardous Materials Info Centre	
PLEASE REPLY TO		Roger Donallon	
OUR NUMBER	00441524 32080	YOUR NUMBER	001 202 366 3012

Re: Shipment of flammable liquids by road.

Dear Edward,

Our company ships a flammable liquid to the US. One of our customers is having difficulty shipping the product by road via UPS. We just wish to check that our interpretation of the requirements is correct and would be grateful if you would confirm in writing that they can legally ship the product by road via UPS under the following circumstances.

Product Details.

Class 3 hazardous flammable liquid containing alcohol N.O.S.
UN number 1987
Packaging group 3.
Container size 500ml.
Case quantity 12.
Packaging format trigger bottles labelled and packaged for consumer use.

Our understanding of the requirements.

Because of the 500ml content, the product is excepted from labelling requirements by virtue of limited quantity.

We are able to re-classify the product as a consumer commodity by marking one side or end of each case "Consumer Commodity Alcohol N.O.S. ORM-D.




Provided that each case is marked in this way in a black rectangle which 0.25 inches larger than the edge of the print, the product can be shipped legally by road via UPS without any additional labelling or road freight papers.

I would again be grateful if you could confirm by fax or E-mail to the above number for my attention that this is the case.

I look forward to hearing from you

Best Regards,


Roger Donallon
Sales Director.

**Carr & Day & Martin Ltd
Product Safety Data Sheet**

1 Identification of Preparation and the Supplier

Trade Name: Belvoir Spray Soap
Supplier: Carr & Day & Martin Ltd, St George's Quay, Lancaster LA1 5QJ.
Tel: 01524 381821 Fax: 01524 32080

Hazard details are held by the National Poisons Service

2 Information on Ingredients**Hazardous ingredients:**

Material of Component	% Range (active)	Symbol	Risk Phrases
Methylated Spirits	20-25% w/w		

3 Hazards Identification

Not regarded as a health hazard under current legislation.

Flammable.

4 First Aid Measures**General:**

NOTE! Keep affected person away from heat, sparks and flames.

Eyes:

Immediately irrigate with eyewash solution or clean water, holding the eyelids apart for at least 10 minutes. Obtain immediate attention.

Skin:

Remove contaminated clothing. Wash off immediately with water. Obtain immediate medical attention.

Ingestion:

Do not induce vomiting. Wash out mouth with water, then give plenty of milk or water to drink and obtain urgent medical attention, showing the label.

Inhalation:

Remove patient from exposure. Obtain medical attention if ill effects occur. Perform artificial respiration if breathing has stopped.

5 Fire Fighting Measures**Extinguishing Media:**

Alcohol resistant foam carbon dioxide, sand, dry chemicals, dolomite etc.

Protective Equipment for Fire Fighting:

Keep run-off water out of sewers and water sources. Dike for water control. Cool containers exposed to flames with water until well after the fire is out. Move container from fire area if it can be done without risk. Use water spray to reduce vapours. If risk of water pollution occurs, notify appropriate authorities. If risk of water pollution occurs, notify appropriate authorities.

Unusual fire & explosion Hazards:

May form explosive or toxic mixtures with air. May travel considerable distance to source of ignition and flash. Vapours may ignite.

6 Accidental Release Measures

Spillage/cleanup methods: Ventilate well. Remove ignition sources. Do not allow chemical to enter confined spaces such as sewers due to explosion risk. Absorb small quantities with paper towels and evaporate in a safe place (fume hood). Allow sufficient time for vapours to completely clear the hood ducts, then burn the paper in a location away from combustible materials. Inform authorities if large amounts are involved. Dilute with copious amounts of water.

7 Handling and Storage**Handling:**

Avoid spilling and contact with skin and eyes. Keep away from heat, sparks and open flame. Ventilate well, avoid breathing vapours. Use approved respirator if contamination is above accepted level.

Storage:

Store in a cool place in the original container, tightly closed. Keep away from oxidising agents, heat and flames.

8 Personal Protection/Exposure Controls**Respiratory Protection:**

Well ventilated area.

Hand Protection:

Suitable protective gloves.

Eye Protection:

Eye/face protection recommended. Provide eye wash station.

Skin Protection:

Wear appropriate clothing to avoid repeated or prolonged skin contact.

Occupational Exposure Limits:

Hazardous Ingredient(s)	LTEL 8hr TWA		STEL (15 mins)		Type	CAS
	ppm	mg/m3	ppm	mg/m3		
Methylated Spirits	1000	-	-	-	CE	

9 Physical and Chemical Properties

Appearance/Colour:	Liquid.	Auto Ignition Temp (°C):	No data.
Odour:	Acetone, ketone.	Vapour Pressure @ 20°C:	No data.
Boiling Pt (°C):	94	Relative Density @ 20°C:	No data.
Melting Pt (°C):	No data	Flash Pt (°C):	23°C. (Sh CC)

10 Stability and Reactivity

Conditions to Avoid:	Heat, sparks, flame.
Materials to Avoid:	Strong oxidising agents.
Hazardous Decomposition Products:	Toxic gases/vapours/fumes of: CO Carbon Monoxide.

11 Toxicological Information

Gas or vapour is harmful on	prolonged exposure or in high concentration. CNS depressant. Narcotic effect.
Eye Contact:	Irritating to eyes and mucous membranes.
Skin Contact:	May cause irritation or mild dermatitis. Defatting, drying and cracking of skin.
Ingestion:	May cause severe internal injury.
Inhalation:	May be harmful by inhalation and may cause respiratory distress.

12 Ecological Information

Biodegradability:	Biodegradable.
Toxicity:	No data.
Effect on Effluent Treatment:	At levels found in effluent, will have no adverse effect on biological treatment plants.
Distribution:	Bioaccumulation is unlikely.
Mobility:	Unlikely to build up in sediment or sewage sludge.

13 Disposal

Product:	Dispose of in accordance with local or national regulations in licensed special waste.
Packages:	Containers should be cleaned by appropriate methods and disposed of by landfill or incineration as appropriate.

14 Transport Information

Classification of Transport:	Flammable
UN Number:	UN1987
UN Proper Shipping Name:	Alcohols, N.O.S. (Contains Methylated Spirit).
ADR/RID Class:	3
ADR/RID Item No:	3.31C
IMDG Packaging Group:	III
IMDG Class:	3

15 Regulatory Information:

EEC Classification:	Flammable.
Risk Phrases:	R10: Flammable Safety Phrases: S2: Keep out of reach of children. S23A: Do not breathe gas/fumes/vapour/spray. S51: Use only in well ventilated areas. S46: If swallowed seek medical advice immediately and show this container label.

16 Other Information

This data sheet was prepared in accordance with Directive 93/112/EC.

Date of preparation 24 January 2001.