



U.S. Department
of Transportation

Pipeline and Hazardous
Materials Safety
Administration

1200 New Jersey Avenue, SE
Washington, D.C. 20590

DEC 17 2014

Mr. Ron Van Bavel
Vice President
Innovage, LLC
19517 Pauling
Foothill Ranch, CA 92610

Ref. No.: 14-0141

Dear Mr. Bavel:

This is in response to your email dated July 15, 2014 requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) regarding transportation requirements for table tennis balls (ping pong balls). You note that your company is considering importing sets that contain four table tennis balls in each set. You state that the table tennis balls are made of celluloid. You ask if finished goods such as table tennis balls made of celluloid are a regulated commodity under the HMR.

In accordance with § 173.22, it is the shipper's responsibility to properly classify a hazardous material. This office generally does not perform this function. However, it is the opinion of this office that the entry for UN 2000 Celluloid only applies when the material is in a pre-manufactured state i.e. blocks, rod, rolls, sheets, tubes etc. PHMSA regulates the transportation in commerce of materials it determines are hazardous in that "the amount and form [of the material] may pose an unreasonable risk to health and safety or property." 49 U.S.C. 5103, as delegated to PHMSA in 49 CFR 1.53(b). Based on the information provided in your letter, including form and quantity of celluloid contained in the table tennis balls, it is our determination the table tennis balls are not in a quantity and form that pose an unreasonable risk to health, safety or property during transportation and, therefore, are not subject to regulation under the HMR.

I trust this information is helpful. If you have further questions, please do not hesitate to contact this office.

Sincerely,

Shane C. Kelley
Acting International Standards Coordinator
Standards and Rulemaking Division

Dodd, Alice (PHMSA)

Webb
173.213, 173.240
Packaging Specs
14-0141

From: Ciccarone, Michael CTR (PHMSA)
Sent: Tuesday, July 15, 2014 2:09 PM
To: Hazmat Interps
Subject: FW: Formal request for interpretation regarding Ping Pong balls as dangerous goods
Attachments: 20140709064641934.pdf; MSDS.PDF

Shante and Alice,

We received this request for a letter of interpretation here at the info center. This person spoke with Mike Pagel in the HMIC, who discussed the topic with Steve Webb.

Thanks,

Mike

From: Ron Van Bavel [mailto:rvb@innovage.net]
Sent: Tuesday, July 15, 2014 1:59 PM
To: INFOCNTR (PHMSA)
Subject: Formal request for interpretation regarding Ping Pong balls as dangerous goods

D.O.T. team,
I was given this email address by Mike, one of the people that answers telephone calls at the Hazardous Materials Info Center.

Our company is looking at importing beer pong sets into USA. Each set includes 22 cups, 1 pen, 1 mat, and 4 ping pong balls. There will be 1,083 sets in a 40'HQ container, or a total of 4,332 balls. The balls are made of celluloid (see attached MSDS).

It seems celluloid is regulated internationally by UN2000, which states that "Celluloid, in blocks, rods, rolls, sheets, tubes, etc. (except scrap)" is considered hazardous.

I have also attached a UN memo that addresses how UN2000 has been misinterpreted so that anything containing celluloid must be DG. The attached memo proposes to clarify UN 2000 so that it is clear that finished goods such as ping pong balls are not considered DG. In my opinion, it isn't changing UN2000, it is just clarifying things to make it clearer so that parties do not misinterpret UN2000 by considering finished goods to be hazardous.

As such, I am asking the D.O.T. to provide their interpretation of UN2000 and confirm that finished goods such as ping pong balls are not subject to UN2000 or as dangerous goods.

Thanks for your help and time on this matter. I can be reached via email or my direct telephone number is 949-609-5047.

Regards, Ron Van Bavel
VP – Innovage LLC

Tel: 949-609-5047

Fax: 949-587-9024

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09/01/2008 14:24 057185330887

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MATERIAL SAFETY DATA SHEET

Section 1. Product Identification

Name: Table Tennis Ball

Synonyms: CELLULOID

Contact Information: Zhejiang Shuguang Sport Equipment Co., Ltd.

Anji County Liangpeng Industry Area, Zhejiang

Province, China

Emergency Ph#: 0086-571-86330893

Info Ph#: 0086-571-86330723

Section 2. Summary Of Hazards

Warning!

Inhalation of concentrated boiling vapor may irritate nose & throat may irritate eyes.

Section 3. Physical Properties

COMBUSTIBLES. IT IS EASY TO BURN AND IGNITION

DECOMPOSED AT THE TEMPERATURE 180°C

PROPORTION: 1.40

Section 4. Fire And Explosion Hazard information

Fire and Explosion Hazards:

Decomposition under fire conditions will generate carbon monoxide and phenol, and may generate other toxic vapors.



Section5.Hazard Ratings For Celluloid**HMIS****Health****RATINGS****Flammability****Section6.Health Hazard Information****Acute Health Hazard:**

Inhalation:Inhalation of concentrated boiling vapor may irritate the nose and throat.

Eye Contact:May cause eye irritation.

Skin Contact:Safety.

Ingestion:May be harmful id swallowed.

Section7.Protective Equipment And Exposure Control Methods

DO NOT KEEP IT NEAR THE FIRE OR PUT IN THE PLACE OF HIGH TEMPERATURE.

Section8. Reactivity Bata

Stability:Stable

Section9. Splll Or Leak Procedures**Section10. Waste Disposal**

Disposal must be made in accordance with app,icable governmental regulations.Do not contaminate any streams,lakes,or ponds.



Section 11. Additional Precautions

1. THE PRODUCT SHOULD BE STOCKED IN THE AIR-FREE WAREHOUSE TO KEEP DRY AND FROM HEAT.
2. DO NOT KEEP IT NEAR THE FIRE OR PUT IN THE PLACE OF HIGH TEMPERATURE.
3. DO NOT PUT IT TOGETHER WITH COMBUSTIBLES, EXPLOSIONS OR ACIDTY.
4. BY TRANSITION, DO NOT PRESS HEAVILY. KEEP IT FROM EXPOSING TO THE SUN AND RAIN.

Section 12. OSHA/SARA/Title III/TSCA Information

Celluloid is not listed as an Extremely Hazardous Substance under Section 302 of SARA Title III.

Celluloid is not subject to the reporting requirements of Sections 311 or 312 of SARA Title III.

Celluloid does not contain ingredients (at a level of 1% or more) on the List of Toxic Chemicals of SARA Title III.

**Section 13. Handling and Storage**

Precautions in Handling: Apply according to good manufacturing and industrial hygiene practices with proper ventilation. Do not drink, eat or smoke while handling. Respect good personal hygiene.

Storage Conditions: Store in cool, dry and ventilated area away from heat



sources.

Section14.Transport Regulations

	Class
Road	NR
Air	NR
Sea	NR

Section15. Regulatory Information

Hazards	—
Symbots	—
R.Phrases	—
S.Phrases	—



Section16.Other Information

The above information ix bellevd to be comect but does not purport to be all inclusive and shall be used only an a guide.

MSDS Creation Date:9/03/2008

MADS Revisde Date: 9/03/2008





Secretariat

Distr.: General
31 March 2014

Original: English

**Committee of Experts on the Transport of Dangerous Goods
and on the Globally Harmonized System of Classification
and Labelling of Chemicals****Sub-Committee of Experts on the Transport of Dangerous Goods****Forty-fifth session**

Geneva, 23 June- 2 July 2014

Item 4 (c) of the provisional agenda

Listing, classification and packing: miscellaneous**Clarification of requirements applicable to UN 2000, celluloid****Transmitted by the Dangerous Goods Advisory Council (DGAC)¹****Introduction**

1. At a previous session, the Sub-Committee agreed to include a provision in 2.2.2.4 to indicate that sports balls are not subject to the Model Regulations. 2.2.2.4 states: "Gases of Division 2.2 are not subject to these Regulations when contained in the following: Balls intended for use in sports". Nevertheless, it has come to DGAC's attention that some manufacturers of tennis table (ping pong) balls that are manufactured from celluloid are transporting them as regulated goods under the entry UN 2000, Celluloid. Some airline personnel and competent authorities have suggested that celluloid tennis table balls are subject to the transport regulations and questioned whether the exception in 2.2.2.4 applies. DGAC has uncovered Safety Data Sheet documents related to celluloid tennis table balls. While some may think that it should be obvious that celluloid table tennis balls are not subject to the Model Regulations there appears to be a need for clarification.

2. Celluloids are a class of compounds created from nitrocellulose and camphor, with added dyes and other agents. They were generally considered the first thermoplastics and are easily molded and shaped. While the entry "UN 2000, CELLULOID in block, rods, rolls, sheets, tubes, etc., except scrap" specifically mentions in block, rods, rolls, sheets, tubes, etc. except scrap there seems to be confusion that is leading to some individuals believing that the entry applies to manufactured articles such as jewelry, guitar picks, billiard balls, dolls, picture frames, charms, hat pins, buttons, buckles, stringed instrument

¹ In accordance with the programme of work of the Sub-Committee for 2013-2014 approved by the Committee at its sixth session (refer to ST/SG/AC.10/C.3/84, para. 86 and ST/SG/AC.10/40, para. 14).

parts, accordions, fountain pens, cutlery handles, kitchen items and table tennis balls. DGAC suggests that there may be a need to further clarify that the entry should not be used for manufactured articles. It is DGAC's understanding that the intent of UN 2000 was to regulate quantities of celluloid raw materials used in manufacturing or materials shipped for recycling or disposal and not consumer articles such as table tennis (ping pong) balls which are typically 40 mm in diameter and weigh approximately 2.7 grams. DGAC does not believe that such articles pose a risk to health, safety, the environment or property during transportation.

Proposal

3. DGAC requests that the Sub-Committee clarify that celluloid tennis table balls are not subject to the Model Regulations. DGAC requests that the Sub-Committee:

- (a) Include a clear statement in the report of the 45th session indicating that celluloid tennis table balls are not subject to the Model Regulations; and
- (b) Include a new SP XXX against UN 2000 as follows:

"XXX This entry does not apply to manufactured articles [such as table tennis balls*]."

* The Sub-Committee is invited to consider whether examples are necessary.
