



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

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

DEC 7 2001

Mr. James F. Timmins
Enefco International, LTD.
1130 Minot Ave.
Auburn, ME 04211-1120

Ref. No. 01-0289

Dear Mr. Timmins:

This is in response to your letter dated November 2, 2001 regarding the applicability of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) to cleaning cards, pens, and wipes that contain 3 ml or less of isopropyl alcohol. You state that your products contain no free flowing alcohol.

For the proper shipping name "Solids containing flammable liquids, n.o.s.," the Hazardous Materials Table refers you to special provision 47. Special provision 47 excepts from the HMR sealed packets that contain less than 10 ml of a flammable liquid in Packing Group II or III when the liquid is completely absorbed onto a solid material. Based on the information that you provided in your letter, it is the opinion of this Office that your cleaning cards, pens, and wipes are not subject to the requirements of the HMR.

I hope this information is helpful.

Sincerely,

Edward T. Mazzullo
Director, Office of Hazardous Materials Standards



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**ENEFCO INTERNATIONAL, LTD.**

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Classification
01-0289

James F. Timmins
Enefco International, LTD.
1130 Minot Ave. / PO Box 1120
Auburn, ME 04211-1120

Nov. 02, 2001

Attn.: Edward Mazzullo
US DOT / RSPA (DHM-10)
400 7th Street SW
Washington, DC 20590

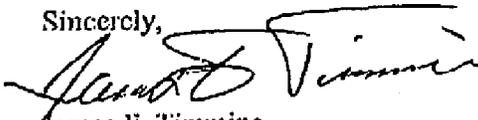
Dear Mr. Mazzullo,

I would like to request an Interpretation Letter regarding the solids containing flammable liquids under 172.101 UN 3175 Packing group II Special provision 47. If this could be addressed to me at the above address I would greatly appreciate it.

We are a manufacturer of cleaning cards, pens, and wipes that contain 3 ml or less of Isopropyl Alcohol. The cleaning cards and wipes are saturated and pouched in a foil pouch. The card and wipes absorb the Isopropyl Alcohol completely. The pens have a felt within the barrel that is saturated like you would a marker. In all these products there is no free flowing alcohol.

I would like to extend my appreciation for your help in this matter. I also would acknowledge that Miss H. Singh of the Hazmat Exemption Office, and Arthur Pollack of the Regulations Office were extremely helpful in directing me to your office.

Sincerely,


James F. Timmins
Div. Manager
Enefco International, LTD