



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

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

MAY 16 2008

Mr. Robert A. Becker  
VP Global Sales  
Imperial Freight Brokers, Inc.  
2287 NW 102nd Place  
Doral, FL 33172

Ref. No.: 08-0056

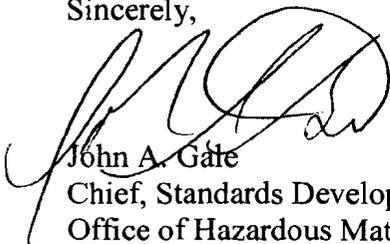
Dear Mr. Becker:

This is in response to your March 3, 2008 letter and subsequent conversation with a member of my staff requesting clarification on the shipment of alcohol pads under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). You describe the product, "Alcohol Prep Pads," as pads saturated with less than 10 mL of 70% v/v isopropyl alcohol. The pads are individually packaged in a four-layer wrapper that provides an air-tight seal. Additionally, you ask if the HMR prohibit the transportation of these "Alcohol Prep Pads" with sharps, such as lancets, in the same freight container.

Alcohol pads or swabs are not subject to the HMR when they contain less than 10 mL of a Class 3 (flammable liquid) material in Packing Group II or III, including isopropyl alcohol or mixtures thereof, absorbed onto a solid material provided there is no free liquid in the packet or article. This determination is based on Special Provision 47 in § 172.102. The same exception is specified in Special Provision 216 of the International Maritime Dangerous Goods (IMDG) Code for the international transportation of dangerous goods by vessel. Neither the HMR nor the IMDG Code prohibit the transportation of alcohol pads and sharps, such as lancets, in the same freight container.

I hope this information is helpful. Please contact us if you require additional assistance.

Sincerely,



John A. Gate  
Chief, Standards Development  
Office of Hazardous Materials Standards

Eichenlaub

§173.4

Small Quantity  
Exceptions

08-0056



**Imperial Freight Brokers**

3/3/2008

Office of Hazardous Materials Standards,  
Pipeline and Hazardous Materials Safety Administration,  
Attn: PHH-10,  
U.S. Department of Transportation, East Building,  
1200 New Jersey Avenue, SE.,  
Washington, DC 20590-0001.

Dear Sir(s),

I am requesting a ruling or interpretation of (HMR:49CFR Parts 171-180) specifically if alcohol Prep Pads, Saturated with 70% v/v isopropyl alcohol can be transported as 173.4 Limited Quantity or ORM-D.

The product is imported from China via Ocean vessel into the USA, currently we are being told that this must be imported as a HM UN 1219 Class 3, we feel as though the product meets requirements set forth in 173.4

Enclosed I've included a sample of the product in the two (2) packaging styles:

- a) **100 individual prep-pads:** within a master carton that holds 50 individual boxes with an average wgt of 11 lbs per master carton, case dimensions are 13 x 9 x 10 inch.
- b) **200 individual prep-pads:** are packed in a master carton containing 24 boxes per case, with an average wgt of 11 lbs per master carton, case dimensions are 13 x 9 x 10 inch.

A 20Ft container holds 1600 cases of the above mentioned and a 40FT container holds on average 2400 cases, with 99% of the cargo being imported in a 20ft container.

In addition the question of commingling this product in a 40FT or 20FT container from China, with products like:

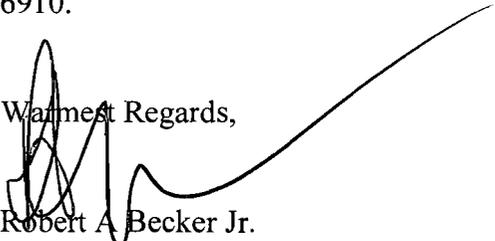
- c) **Lancets:** these items are packed 100 pcs per box with 50 boxes inside a master carton, average wgt per box is 8 lbs, dimensions of the master carton is 13 x 7 x 9 inch.

d) **Lancing Device**; these items are packed 1 per box, 100 boxes per case with an average wgt of 5 lbs, dims 11 x 12 x 5 in.

We are simply seeking clarity on the proper importation and handling of the above mentioned product.

If you need additional information or have any questions I can be reached at 305-592-6910.

Warmest Regards,



Robert A. Becker Jr.  
VP Global Sales  
Imperial Freight Brokers, Inc.

Cc/  
Rodney Marsh/Specialty MS  
Nick Capella/Specialty MS  
Ralph De La Rosa/IFB/Customs Broker

FedEX # 7918 6067 1240



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ISO 9001:2000  
ISO 13485:2003



SMS Alcohol Prep Pads

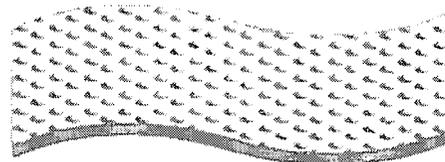
## Alcohol Prep Pads

Thicker and softer than other alcohol pads, Specialty Medical Supplies' (SMS) Alcohol Prep Pads ensure reliable site preparation for safe hygienic injections and other applications. SMS Alcohol Pads are saturated with 70% V/V Isopropyl Alcohol.

- Thicker & Softer Material
- Individually wrapped
- Large / Easy To Handle

**Packaging Description:**

- 100 Pieces per Box
- 50 Boxes per Case
- 11 lbs. Per Case
- Case Dimension:  
• 13 1/8" x 8 1/2" x 9 5/8"
- 200 Pieces per Box
- 24 Boxes per Case
- 11 lbs. Per Case
- Case Dimension:  
• 12 3/4" x 8 5/8" x 9 1/4"



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3882 NW 124th Avenue - Coral Springs, FL 33065

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ISO 9001:2000  
ISO 13485:2003



**SMS Assure Lancets™**

**Assure Lancets™**

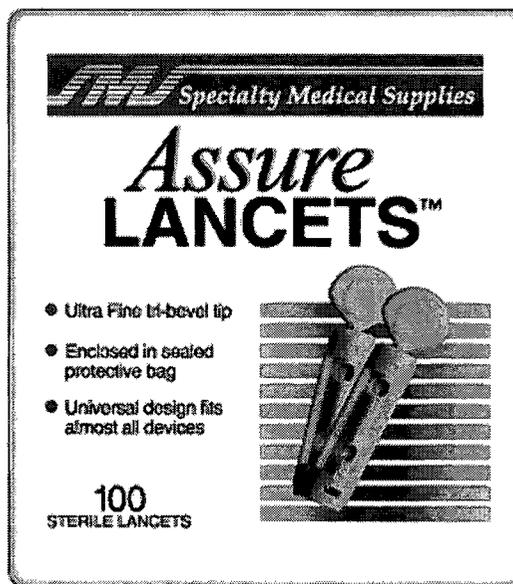
A traditional lancet designed with ease of use in mind. The needles in the Assure Lancet have tri-bevel tips and are electro-polished for maximum patient comfort. Assure Lancets are compatible with all universal lancing devices.

**Packaging Description:**

- 100 Pieces per Box
- 50 Boxes per Case
- 8 lbs. Per Case

**Case Dimensions:**

- 12 5/8" x 6 1/2" x 8 1/2"



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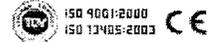
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SMS Lancing Devices

## Lancing Devices

Specialty Medical Supplies' (SMS) Lancing Device assists patients in monitoring their glucose levels easily and safely. SMS has 2 different lancing devices, a 5 adjustable depth setting device and an alternate site clear cap device for testing. SMS' 5 depth device adjusts to match different skin types; 4-5 for hard to penetrate skin, 3 for average skin and 1-2 for soft skin. The Adjustable and Alternate Site Lancing Device are made to use with any standard/universal lancet.

**Packaging Description:**

- Adjustable & Alternate Site Device*
- 1 Piece per Box
- 100 Boxes per Case
- 5 lbs. Per Case
- Case Dimension:
- 10 1/2" x 10 1/2" x 5 1/4"



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