



U.S. Department of Transportation  
**Pipeline and Hazardous Material  
Safety Administration**

1200 New Jersey Ave, S.E.  
Washington, D.C. 20590

JAN 28 2014

Mr. Michael Toole  
National Sales Manager  
Air Techniques, Inc.  
1295 Walt Whitman Road  
Melville, NY 11747

Ref. No.: 13-0226

Dear Mr. Toole:

This is in response to your email dated November 18, 2013, requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) relating to the hazard classification of a "surface disinfectant and deodorizing spray." You provide a material safety data sheet (MSDS) for the product in question and ask if the manufactures classification as perfumery products, UN 1266, PG II is correct based on the MSDS.

In accordance with § 173.22, it is the shipper's responsibility to properly classify a hazardous material. This Office does not generally perform that function. Please see interpretation 13-0135 issued by this Office which states; "there is no definition for 'perfumery products' in the HMR. However, perfume is typically defined as a fluid preparation used for scenting, composed of natural essences or synthetics and a fixative." Interpretation 13-0135 further indicates that the classification as perfumery products is dependent on the primary function of the product. It appears the function of the product in question is not as a perfume, but rather, a product intended to be used as a disinfectant or cleaner, and as such the description "UN1266, Perfumery products" is not appropriate.

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

Sincerely,

Duane A. Pfund  
International Standards Coordinator  
Standards and Rulemaking Division



Webb  
§171.22  
§171.23  
TDG  
13-0226

Wednesday, November 13, 2013

To whom it may concern,

Re: Monarch Surface Disinfectant

### Transport of Dangerous Goods Statement

**Product Purpose:** Monarch Surface Disinfectant is meant to deodorize Dental offices while killing bacteria and fungi. It eliminates mold and eugenol smells that predominate the Dental clinic offending clientelle.

**Chemistry:** The product has a complex chemistry of volatile and flammable solvents. These include Ethyl Acetate, Lime solvent, USP Ethanol and some esters.

In consideration of the mixed chemistry and the product purpose to improve the smell of a dental clinic, we have classified it as UN 1266.

Micrylium has not had a TDG issue in the United States, Canada or Europe in the 6 years we have been using this designation.

Yours sincerely,

Dean Swift  
Technical Director

## Drakeford, Carolyn (PHMSA)

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**From:** INFOCNTR (PHMSA)  
**Sent:** Monday, November 18, 2013 5:14 PM  
**To:** Drakeford, Carolyn (PHMSA)  
**Subject:** FW: Request of Letter of interpretation  
**Attachments:** Draft 11-13 Monarch MSDS.docx; Dangerous Goods Statement 2013.pdf

Hi Carolyn,

This caller requested we submit this e-mail as a formal letter of interpretation.

Thanks,  
Victoria

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**From:** Michael Toole [<mailto:mtoole@airtechniques.com>]  
**Sent:** Monday, November 18, 2013 2:10 PM  
**To:** INFOCNTR (PHMSA)  
**Cc:** Nicole Miller  
**Subject:** Request of Letter of interpretation

To Whom It May Concern:

We are looking for interpretation of the MSDS sheet and Manufacturing Letter (See Attached) of a product that we are going to be selling within the US. The manufacture uses the UN1266 classification which we believe is correct, however we would like to ensure that this classification is correct based on MSDS sheet. The product is a surface disinfectant and deodorizing spray used within the dental industry.

Thank you,

*Michael Toole*

National Sales Manager - Consumables | Air Techniques, Inc. / ALLPRO Imaging  
1295 Walt Whitman Road, Melville, NY 11747-3062  
| C: 617.849.0084 | P: 516.214.5617 | F: 516.433.3831 | [mtoole@airtechniques.com](mailto:mtoole@airtechniques.com) | Skype: mtoole1918



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<b>1. Identification</b>	<b>MONARCH</b>	<b>Indication</b> Surface Disinfectant & Deodorizing Liquid
<b>Distributor</b>	Air Techniques, Inc. 1295 Walt Whitman Road, Melville, New York 11747 Contact: 516-433-7676; www.airtechniques.com	

<b>2. Hazard Identification</b>	<b>Health Hazard Identification</b> No serious Health Hazard	<b>Physical Hazard Identification</b> Flammable	<b>Environmental Hazard Identification</b> Biodegradable, No Endocrine Disruptors
<b>Hazardous Component</b> Perfumery Product with Flammable Solvents	<b>CAS#</b> na-Blend	<b>UN#</b> 1266	<b>R Phrases</b> R11
		<b>Concentration</b> 71.5%	<b>TLV</b> >1000 ppm

**3. Composition Chemical Characterization**  
Deodorizing Lime Solvent, Ethanol, Chlorhexidine Gluconate, Water with Non-Ionic Surfactants, anti-corrosives

**4. First Aid Measures**  
**General** Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco.  
**Inhalation** Mild reversible irritation. May cause dizziness.  
**Ingestion** Drink quantities of milk or water to dilute.  
**Skin contact** No adverse effects. Slightly drying.  
**Eye contact** Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.

**5. Fire Fighting Measures**  
Use dry chemical, Alcohol Foam or CO<sub>2</sub>. Use water spray to dispense vapours and cool items.

**6. Accidental Release Measures**  
No specific measures are necessary provided vapours are not permitted to build up.

**7. Handling & Storage**  
Store in a cool, dry well ventilated location. Keep away from heat, sparks and flame.  
DO NOT mix with bleach or Peroxides.

**8. Exposure Controls-Personal Protection**  
Avoid contact with eyes or clothing. Wear safety glasses.

<b>9. Physical &amp; Chemical Properties</b>								<b>Kinematic Viscosity</b>
<b>Form</b>	<b>Colour</b>	<b>Scent</b>	<b>Solidification point</b>	<b>Boiling point</b>	<b>Flash Point</b>	<b>Density</b>	<b>pH</b>	<b>mm<sup>2</sup>/s</b>
Liquid	Green	Lime	-20 <sup>o</sup> C	87 <sup>o</sup> C	17 <sup>o</sup> C	.866	9.9	16

<b>10. Stability &amp; Reactivity</b>	<b>Incompatibility</b>	<b>Decomposition products</b>
Stable under normal conditions.	Strong oxidants, acid chlorides, silver salts	CO <sub>2</sub> CO

**11. Toxicological Data**  
 Acute Dermal LD<sub>50</sub>>5000 mg/kg; Acute Inhalation rat LC<sub>50</sub>:2.3mg/L; Not found to be a dermal sensitizer;  
 Acute Oral LD<sub>50</sub>>5000 mg/kg; Occular irritation 0.0 after 7 Days. Tests performed by product Safety Labs, Dayton, NJ  
 Grain derived Ethanol USP. All Ingredients Food or Pharma Grade. Free of Nonyl Phenyl Ethoxylates.  
**Reproductive Hazards** Ingestion of large amounts can lead to liver damage  
**Carcinogenicity** None

**12. Ecological information**  
**Surfactants are readily biodegradable linear ethanol ethoxylates. All ingredients USP Pharma or Food Grade**  
**Soil** Readily biodegrades      **Water** Readily biodegrades      **Air** Volatile      **Disposal** Domestic

**13. Disposal considerations** Domestic, No restrictions. Water Dilution 4:1 for flammability considerations

<b>14. Transport Information</b>	<b>Land</b>	<b>Sea</b>	<b>IATA</b>
	Hazard Class 3 UN1266 Packing Group II <b>Limited QTY 5 L max.</b>	Hazard Class 3.2 UN1266 Packing Group II <b>Limited Qty 5 L max.</b>	Hazard Class 3 UN1266 Packing Group II <b>Limited QTY 500 mL.</b>
	Emergency Response Guide #127	Emergency Response Guide #127	Emergency Response Guide #127

**15. Regulatory**  
 TSCA-No reporting required all ingredients listed in inventory. R11: Highly flammable. S9: Keep container in well-ventilated place. S16: Keep away from sources of ignition- No smoking. CERCLA- No hazardous pollutants- No Ozone depletion.

**16. Other Information**  
 The information and recommendations contained herein are based upon data believed to be correct. However, no guarantee or warranty of any kind expressed or implied, is made with respect to information and recommendations contained herein.