



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

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

APR 15 2016

Mr. David M. Stone  
President  
Photosol, Inc. dba Photographic Solutions  
430-G Ansin Blvd.  
Hallandale, FL 33009

Ref No.: 15-0153

Dear Mr. Stone:

This letter is in response to your July 22, 2015 email requesting clarification to the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to a product your company produces and markets. The specific product in question is a "wash n dry" style packet containing an absorbent synthetic cloth with approximately 3 drops (3mL) each of methanol, a Class 3 (flammable) liquid. You state there is no free liquid present as it is completely absorbed by the material and fully sealed within the packet.

Under the HMR, your company's product would be appropriately described as "UN3175, Solids containing flammable liquid, n.o.s., 4.1, PG II." However, as specified in § 172.102(c)(1), Special provision 47, small inner packagings consisting of sealed packets containing less than 10 mL of a Class 3 (flammable) liquid in Packing Group II or III, and absorbed into a solid material are not subject to the requirements of the HMR provided there is no free liquid in the packet.

I hope this information is helpful. Please contact us if we can be of further assistance.

Sincerely,

T. Glenn Foster  
Chief, Regulatory Review and Reinvention Branch  
Standards and Rulemaking Division

Goodall, Shante CTR (PHMSA)

Stevens  
173.4  
Small quantities  
15-0153

**From:** Geller, Shelby CTR (PHMSA)  
**Sent:** Wednesday, July 22, 2015 2:09 PM  
**To:** Hazmat Interps  
**Subject:** FW: formal Letter of Interpretation request

Dear Shante and Alice,

Please see the request for a formal letter of interpretation below. I spoke with Mr. Stone about his request.

Thanks,  
Shelby

**From:** david4w@gmail.com [mailto:david4w@gmail.com] **On Behalf Of** David M. Stone  
**Sent:** Wednesday, July 22, 2015 1:07 PM  
**To:** INFOCNTR (PHMSA)  
**Subject:** formal Letter of Interpretation request

formal Letter of Interpretation request (LOI)  
22 July 2015

Dear USDOT,

My company produces and sells a "wash n dry" style packet containing an absorbent synthetic cloth with approximately 3 drops (3ml) each of methanol. There is no loose liquid as it is all absorbed by the material and fully sealed within the packet.

Around 1990, I received an LOI from the USDOT which stated that due to the limited amount of fluid and the fact that no loose liquid was present, these items presented no hazard when offered for transportation. Now that 25 years has elapsed since that ruling, I am seeking an updated LOI.

We have been a certified hazmat shipper for over 30 years, with no incidents what-so-ever, and are current with all of our certifications. I see nothing in CFR 49 (part 100-177) to indicate a change that might render the original LOI invalid.

The original LOI would have been addressed to us in Massachusetts as follows :

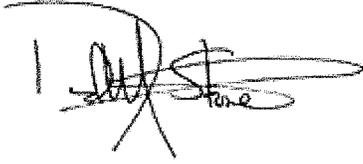
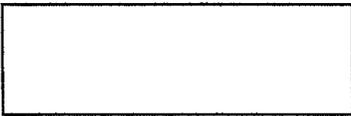
Photographic Solutions, Inc.  
P.O.Box 135  
Onset , MA 02558

or 7 Granston Way  
or 260 Main Street  
Buzzards Bay, MA 02532

Please note our current Florida address and new company name.

Thank-you.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Stone". The signature is stylized with a large, sweeping initial "D" and a horizontal line extending to the right.

David M. Stone, President  
Photosol, Inc. dba Photographic Solutions  
430-G Ansin Blvd.  
Hallandale, FL 33009  
954.458.4744