



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety Administration**

JUN 27 2007

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

Mr. Jim Falls  
McGowan Enterprises, Inc.  
12225 World Trade Drive, Suite F  
San Diego, CA 92128

Ref. No.: 07-0097

Dear Mr. Falls:

This is in response to your May 3, 2007 letter regarding the transportation of isopropanol under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if 70 percent isopropanol may be transported via air or highway transportation. In your letter you state that the 70 percent isopropanol is packaged in a combination packaging consisting of four one-gallon inner receptacles and in pre-saturated wipes.

Provided your packaging meets the applicable requirements in Parts 173 and 178, the 70 percent isopropanol (as described in your letter) may be transported by any mode of transportation; however, there are restrictions concerning passenger aircraft and passenger rail transportation. Your combination packaging contains more than five liters of isopropanol per packaging (i.e., it contains 15.14 liters). As specified in Column 9A of the Hazardous Materials Table (§ 172.101 HMT), the 70 percent isopropanol may not be offered for transportation in packages exceeding five liters net quantity when intended for passenger aircraft or passenger rail. Therefore, your combination packagings, as described, may not be transported by passenger aircraft or passenger rail.

Wipes containing isopropanol are most appropriately transported under the proper shipping name "Solids containing flammable liquids, n.o.s." 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.

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

Sincerely,

Hattie L. Mitchell  
Chief, Regulatory Review and Reinvention  
Office of Hazardous Materials Standards



070097

172.101

**Acute Care** PHARMACEUTICALS

May 3, 2007

Edward Mazullo, Director of OHMS  
USDOT-PHMSA  
East Building – 2<sup>nd</sup> Floor  
1200 New Jersey Avenue SE  
Washington, DC 20590

**Re: Request for Letter of Interpretation**

Mr. Mazullo,

Among many other products, we distribute 70% Sterile Isopropanol (sterile alcohol) in one gallon containers, four gallon containers per case and pre-saturated 70% Sterile Isopropanol / 30% Distilled Water polyester wipers for use in compounding pharmacies.

The manufacturers of these products insist that they must be shipped to us via overnight delivery (air transportation). I am not a security expert, yet it would appear that it would be safer overall to transport this material on a truck, versus an airplane. As you may imagine, the cost of overnight shipping is significantly more expensive versus ground transportation and these items weigh 30-50 lbs. per case.

I would like to receive documentation that we can present to the manufacturers of these products and the freight companies in order to approve shipping of these materials on a truck. Your assistance is much appreciated. Please contact me directly with additional questions.

Best Regards,



Jim Falls, Vice President – Contracts & Sales  
Acute Care Pharmaceuticals  
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San Diego, CA 92128  
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Applicability  
07-0099