



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

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

MAR 27 2013

Mr. Avraham Rahimi
Aris Electronics
11740 Wilshire Blvd., #A603
Los Angeles, CA 90025

Reference No.: 13-0001

Dear Mr. Rahimi:

This is in response to your December 28, 2013 email requesting confirmation from the Pipeline and Hazardous Materials Safety Administration (PHMSA) that "Crest Whitestrips – Supreme" are not subject to the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180).

As provided in § 173.22, it is the shipper's responsibility to properly classify a hazardous material. Such determinations are not required to be verified by this Office. However, based on the Material Safety Data Sheet (MSDS) you provided for the "Crest Whitestrips – Supreme," it is the opinion of this Office that the formulations do not meet the definition of any hazard class and are not subject to the HMR.

I trust this satisfies your inquiry. Please contact us if we can be of further assistance.

Sincerely,

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

Drakeford, Carolyn (PHMSA)

Andrews
§ 171.1
§ 172.101

From: INFOCNTR (PHMSA)
Sent: Friday, December 28, 2012 2:50 PM
To: Drakeford, Carolyn (PHMSA)
Subject: FW: DOT PHMSA Hazmat Center Inquiry

Applicability
13-0001

Hi Carolyn,

This e-mail has additional contact info to add to Avi Rahimi's 12/28 request for an interp letter. The first e-mail contains the attached MSDS.

Thanks,
Victoria

From: avi rahimi [<mailto:avirahimi@yahoo.com>]
Sent: Friday, December 28, 2012 2:47 PM
To: INFOCNTR (PHMSA)
Subject: Re: DOT PHMSA Hazmat Center Inquiry

Dear victoria my name is avi and i spoke to you earlier to reg a request for formal letter. in this e mail i wanted to request a formal letter of interpretation reg an item described as crest whitestrips supreme professional that it is not classified as hazardous item for DOT i am going to attach the MSDS on this product as well . please let me know if you have any questions or concerns my information is below to contact me. thanks and looking forward for your help.

avraham rahimi
aris electronics
11740 wilshire blvd # A603
la ca 90025
cell number 2136107431

From: "INFOCNTR.INFOCNTR@dot.gov" <INFOCNTR.INFOCNTR@dot.gov>
To: avirahimi@yahoo.com
Sent: Friday, December 28, 2012 11:29 AM
Subject: DOT PHMSA Hazmat Center Inquiry

Dear Avi Rahimi,

We have received your inquiry to the Pipelines and Hazardous Materials Safety Administration's (PHMSA's) Hazardous Materials Information Center (HMIC).

The HMIC provides information on the Hazardous Materials Regulations (HMR), 49 CFR Parts 171-180. The HMR establish regulatory requirements pertaining to the safe and secure transportation of hazardous materials by rail, aircraft, motor vehicle, or vessel. If you require information on the HMR, you may contact the HMIC, which is staffed with regulatory specialists who can quickly answer your questions by phone, Monday through Friday, 9 AM - 5 PM EST at 1-800-467-4922 or (202) 366-4488.

Based on your inquiry, you may be interested in the following URL(s):

Letter of Interpretation 09-0271

<http://www.phmsa.dot.gov/staticfiles/PHMSA/Interpretations/2009/090271.pdf>

Letter of Interpretation 10-0133

<http://www.phmsa.dot.gov/staticfiles/PHMSA/Interpretations/2010/100133.pdf>

Letter of Interpretation 06-248

<http://www.phmsa.dot.gov/portal/site/PHMSA/menuitem.ebdc7a8a7e39f2e55cf2031050248a0c/?vgnextoid=bbd cc0515d544110VgnVCM1000009ed07898RCRD&vgnnextchannel=56acd3c1af814110VgnVCM1000009ed07898RCRD&vgnnextfmt=print>

Interpretation #03-0303

<http://www.phmsa.dot.gov/portal/site/PHMSA/menuitem.ebdc7a8a7e39f2e55cf2031050248a0c/?vgnextoid=6aaf 5794ed745110VgnVCM1000009ed07898RCRD&vgnnextchannel=aa8cd3c1af814110VgnVCM1000009ed07898RCRD&vgnnextfmt=print>

Sincerely,

Victoria, Hazardous Materials Specialist

An e-mail response from this office is considered informal guidance. Formal guidance may be requested in accordance with 49 CFR 105.20. <http://hazmat.dot.gov/infocent.htm>

Drakeford, Carolyn (PHMSA)

From: INFOCNTR (PHMSA)
Sent: Friday, December 28, 2012 2:47 PM
To: Drakeford, Carolyn (PHMSA)
Subject: FW: DOT PHMSA Hazmat Center Inquiry
Attachments: Crest_Whitestrips_-_Supreme.pdf

Hi Carolyn,

We received the following request for a formal letter of interpretation.

Thanks,
Victoria

From: avi rahimi [<mailto:avirahimi@yahoo.com>]
Sent: Friday, December 28, 2012 2:40 PM
To: INFOCNTR (PHMSA)
Subject: Re: DOT PHMSA Hazmat Center Inquiry

Dear victoria my name is avi and i spoke to you earlier to reg a request for formal letter. in this e mail i wanted to request a formal letter of interpretation reg an item described as crest whitestrips supreme professional that it is not classified as hazardous item for DOT i am going to attach the MSDS on this product as well . please let me know if you have any questions or concerns my name is avraham rahimi and my contact number is 213-610-7431. thanks and looking forward for your help.

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Victoria, Hazardous Materials Specialist

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MATERIAL SAFETY DATA SHEET

MSDS Identifier

Crest Whitestrips – Supreme

Page 1 of 4

SECTION I – CHEMICAL / PRODUCT AND COMPANY IDENTIFICATION		
THE PROCTER & GAMBLE COMPANY Health Care Research Center 8700 Mason-Montgomery Road Mason, OH 45040-9462	RATING KEY 4=EXTREME 3=HIGH 2=MODERATE 1=SLIGHT	Hazard Rating Health: 1 Flammability: 0 Reactivity: 0
EMERGENCY PHONE:	Transportation Emergency (24 hour) Telephone Number: CHEMTREC: 1-800-424-9300 in the U.S. and Canada; 1-703-527-3887 for calls originating elsewhere or call the Poison Control Center	Prepared by: Jill Karner, CIH Issue Date: December 3, 2007 Last Reviewed: 10/04/04
Material Name:	Crest Whitestrips – Supreme	

SECTION II – COMPOSITION AND INGREDIENTS			
Hazardous Ingredients as defined by OSHA, 29 CFR 1910.1200, and/or WHMIS under the HPA. These substances are listed because in their pure bulk form, they meet the OSHA definition of hazardous. Any hazards associated with this finished product are listed in Section III of this MSDS.			
Principal Hazardous Components:	CAS Number	Conc. %	Exposure Limit/LC50/LD50
Hydrogen Peroxide	7722-84-1	14	1ppm (ACGIH)
Glycerin	56-81-5	7 – 13	10 mg/m3 (ACGIH)
Sodium Hydroxide	1310-73-2	0.5 – 1.5	2 mg/m3 (ACGIH)

SECTION III – HAZARDS IDENTIFICATION	
Emergency Overview: This mixture is a product regulated by the FDA. This clear gel can produce mild to moderate eye irritation. Ingestion of gel can cause nausea, vomiting, and gastrointestinal irritation. Accidental skin exposure can cause skin bleaching and irritation.	
Eye:	Can cause mild to moderate eye irritation.
Skin:	Exposure can produce skin blanching and irritation.
Inhalation:	Not likely to be inhaled.
Ingestion:	Ingestion can cause gastrointestinal irritation.
Choking/Suffocation:	Keep out of reach of young children.

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SECTION IV – FIRST AID MEASURES	
Eye:	Remove contact lens (if applicable). Flush eyes with water for 15 minutes. Get medical attention if eye irritation persists after water flush.
Skin:	Wash affected area with soap and water.
Inhalation:	Not a likely exposure route.
Ingestion:	Rinse out mouth with water. Get medical attention if more than mild gastrointestinal symptoms are experienced.
Additional First Aid Measures: None	

SECTION V – FIRE FIGHTING MEASURES			
Flash Point:	> 200° F	Flash Point test method:	Closed cup
Auto-ignition Temperature:	<input checked="" type="checkbox"/> Not applicable <input type="checkbox"/> Not available <input type="checkbox"/> deg. C <input type="checkbox"/> deg. F.	Flammable Limits (% by volume in air)	LEL % UEL %
Extinguishing Media:	Use water spray, alcohol foam, or carbon dioxide.		
Explosion Hazards:	None known		
Special Instructions:	None		

SECTION VI – ACCIDENTAL RELEASE MEASURES	
Personal Safeguards:	Avoid excessive contact and contact with the eyes.
Environmental Precautions:	This material is not known to possess additional hazards when spilled, beyond those of other non-hazardous solids.
Spill Clean-up Procedures:	<i>Industrial:</i> Keep from reaching waterways. <i>Household:</i> Product used in household may be disposed of in refuse.

SECTION VII – HANDLING AND STORAGE	
Recommended Storage Temperature:	None
Personal Precautions for Safe Storage and Handling:	Avoid contact with eyes.
Conditions for Safe Storage:	None

SECTION VIII – EXPOSURE CONTROLS, PERSONAL PROTECTION	
This section only applies to the product when used in an industrial setting .	
Ventilation:	Good general ventilation is sufficient for control.
Eye Protection:	Wear safety glasses with side shields.
Respiratory Protection:	None
Skin Protection:	For brief contact normal work attire is sufficient.

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SECTION IX – PHYSICAL AND CHEMICAL PROPERTIES			
Appearance / Color:	Small plastic strips with clear gel sandwiched between them.	Melting Point:	Not available
Odor:	None	Boiling Point:	Not available
Odor Threshold:	Not Applicable	Solubility in Water:	Moderately soluble
Physical State:	Gel	Vapor Pressure (mm Hg):	Not available
Vapor Density:	Not available	Specific Gravity (H ₂ O=1):	Not available
pH:	5.0	Other Data:	Product complies with State and Federal regulations for VOC content.

SECTION X – STABILITY AND REACTIVITY	
Stability:	Stable
Possibility of Hazardous Reaction:	None known
Incompatibility: (Materials to avoid)	None known
Hazardous Decomposition Products:	None known

SECTION XI – TOXICOLOGICAL INFORMATION	
Because the gel is difficult to extrude from between the layers of plastic, the finished product can be considered as a non-hazardous material.	
Chronic Effects:	No chronic health effects reported.
Target Organs:	No target organs reported.
Carcinogenicity:	This finished consumer product is not carcinogenic.
NTP:	No
IARC:	No

SECTION XII – ECOLOGICAL INFORMATION
Relevant ecotoxicity and fate data for ingredients in this formulation have been reviewed. Under normal and foreseeable consumer uses, there are no concerns for aquatic organisms exposed to product ingredients at the anticipated environmental concentrations. The surfactant(s) used in the formulation biodegrade rapidly and do not accumulate in the environment. The product is compatible with down-the-drain disposal routes, including municipal wastewater treatment processes and septic tank systems. This product is intended for dispersive use and should not be disposed of directly into the environment.

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SECTION XIII – DISPOSAL CONSIDERATIONS		
Waste Disposal Method: Disposal is to be performed in compliance with Federal, State/Provincial and Local regulations.		
Households: Product used in household may be disposed of in refuse.		
Industrial Setting:		
Agency	Parameter	Requirement
US EPA		This material is not considered a hazardous waste under United States Resource Conservation and Recovery Act when disposed.

SECTION XIV – TRANSPORTATION	
Agency	Classification
US DOT (transportation by ground)	Non-Regulated
IMDG (transportation by sea)	Non-Regulated
IATA (transportation by air)	Non-Regulated

SECTION XV – ADDITIONAL REGULATORY INFORMATION		
The product(s) described in this Material Safety Data Sheet are regulated under the Federal Food, Drug and Cosmetics Act and are safe to use as per directions on container, box or accompanying literature (where applicable).		
US Federal:		
TSCA – All intentionally-added components of this product are listed on the US TSCA Inventory.		
SARA 313/302/304/311/312 chemicals: None		
US States:		
California: This product has been evaluated and does not require warning labeling under California Proposition 65.		
State Right-to-Know and CERCLA: The following ingredients present in the finished product are listed on state right-to-know lists or state work exposure lists.		
Ingredient(s) (concentration)	CERCLA RQ	State(s)
Hydrogen Peroxide	Not Applicable	CA, CT, IL, IN, KY, MA, MN, NC, NJ, NY, OR, PA, RI
Glycerin	Not Applicable	CA, IL, IN, KY, MA, MN, NC, OR, PA, RI
Sodium Hydroxide	1,000 lbs	Below Reporting Threshold

SECTION XVI – OTHER INFORMATION
<p>DISCLAIMER: This MSDS is intended to provide a brief summary of our knowledge and guidance regarding the use of this material. The information contained here has been compiled from sources considered by Procter & Gamble to be dependable and is accurate to the best of the Company's knowledge. It is not meant to be an all-inclusive document on worldwide hazard communication regulations.</p> <p>This information is offered in good faith. Each user of this material needs to evaluate the conditions of use and design the appropriate protective mechanisms to prevent employee exposures, property damage or release to the environment. Procter & Gamble assumes no responsibility for injury to the recipient or third persons, or for any damage to any property resulting from misuse of the product.</p>