



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

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

JUL 03 2013

Mr. Robb Boros
Patterson Companies, Inc.
c/o Patterson Logistics Services, Inc.
1905 Lakewood Drive
Boone, IA 50036

Ref No.: 13-0135

Dear Mr. Boros:

This is a response to your June 24, 2013 email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) with regard to the selection of a proper shipping name. Specifically, you seek clarification on whether you may use the hazardous materials description "UN1266, Perfumery products," for a product used as a disinfectant or cleaner and not as a perfume.

In accordance with § 173.22, it is the shipper's responsibility to properly class and describe a hazardous material. This Office does not perform that function. 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. Given that the primary function of your product is not as a perfume, but rather, a product intended to be used as a disinfectant or cleaner, the description the description of "UN1266, Perfumery products" would not be appropriate.

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

Sincerely,

Robert Benedict
Chief, Standards Development
Standards and Rulemaking Division

Suchak

§ 171. 8
§ 172. 101

Drakeford, Carolyn (PHMSA)

From: INFOCNTR (PHMSA)
Sent: Monday, June 24, 2013 4:30 PM
To: Drakeford, Carolyn (PHMSA)
Subject: FW: Latter requesting interpretation regarding the definition of Perfumery product.

Definitions
13-0135

Hi Carolyn,

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

Thanks,
Victoria

From: robb.boros@pattersoncompanies.com [mailto:robb.boros@pattersoncompanies.com]
Sent: Monday, June 24, 2013 1:41 PM
To: INFOCNTR (PHMSA)
Subject: Latter requesting interpretation regarding the definition of Perfumery product.

According to Dictionary.com a perfume is *a substance, extract, or preparation for diffusing or imparting an agreeable or attractive smell, especially a fluid containing fragrant natural oils extracted from flowers, woods, etc., or similar synthetic oils.*

In order for a material to be eligible to use the shipping description Perfumery product, UN1266 would its primary end-use function need to meet the definition referenced above for perfume?
Would a material that meets the definition of a flammable liquid, where the a material with a primary function not described as a perfumery product , such as a cleaner or disinfectant, be eligible to use shipping description Perfumery products, UN1266?

Thanks

Robb Boros
Regulatory Compliance Specialist
Patterson Companies, Inc.
515.433.1700 (Fax 1701)

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