



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

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

DEC 23 2014

Mr. Armando Sancerni  
3060 NW 126<sup>th</sup> Ave.  
Doral, FL 33323

Ref. No.: 14-0149

Dear Mr. Sancerni:

This is in response to your letter dated July 22, 2014 requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) regarding transportation requirements for UN2717 Camphor. You note that this particular commodity has no exceptions listed in column 8a of the § 172.101 Hazardous Materials Table, and that the International Civil Aviation Organization Technical Instructions (ICAO TI) allow both excepted and limited quantity shipments of this material as well as shipments offered as consumer commodities. You ask if you are authorized to use the ICAO TI and offer UN2717 as a limited quantity, excepted quantity, or consumer commodity.

Section 171.22(b) authorizes shipments made in conformance with various international standards, including the ICAO TI. A shipment of Camphor UN2717 may be offered as either a limited quantity or excepted quantity shipment for transportation or transported within the United States by aircraft and by motor vehicle or rail either before or after being transported by aircraft in accordance with the provisions of the ICAO TI as authorized by § 171.22(b). Camphor UN2717 is not authorized to be offered as a consumer commodity under the ICAO TI. We have noted this difference in domestic and international exceptions, and PHMSA may consider a regulatory approach to address the issue in the future.

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

Sincerely,

Shane C. Kelley  
Acting International Standards Coordinator  
Standards and Rulemaking Division

Webb  
171.8  
Consumer Commodity  
DOT/RSPA/OHMS  
14-0149  
14 JUL 22 PM 3:30

Office of Hazardous Material Technology  
Pipeline and Hazardous Materials Safety Administration  
U.S. Department of Transportation  
Washington DC, USA 20590

Re: Camphor

Dear Rule Makers;

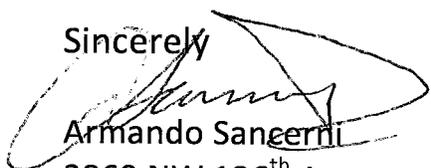
According to the International Civil Aviation Organization (ICAO) -  
"Technical Instruction for the Safe Transport of Dangerous Goods by Air"  
(Doc 9284) as authorized by the US DOT, Hazardous Material Regulations  
(49CFR HMR). Regarding **Camphor**, is allowed in the Excepted and Limited  
Quantity provision and meets the definition of a Consumer Commodity.

Column (8a) of §172.101-HAZARDOUS MATERIAL TABLE for Camphor  
UN2717 does not have Exceptions. However, since Camphor is intended for  
personal care and household use as defined in §171.8 of the HMR  
Consumer Commodity; Am I authorized to use ICAO Technical Instruction  
Dangerous Goods Regulations for this product as a Consumer Commodity,  
Excepted or Limited Quantity?

Also, please advise if there are any Special Permits or Authorizations  
by you for this product.

Thank you

Sincerely



Armando Sancerri  
3060 NW 126<sup>th</sup> Avenue  
Doral FL 33323