



U.S. Department
of Transportation
**Research and
Special Programs
Administration**

400 Seventh St., S.W.
Washington, D.C. 20590

OCT 18 2002

Mr. James W. Stoddard
613 Andover Lane
Coppell, TX 75019-2858

Reference No. 02-0146

Dear Mr. Stoddard:

This is in response to your letter dated May 6, 2002, concerning air carriers' reluctance to transport your Coleman propane camping stove that you use to participate in chili cook-off competitions. You state that you never check the propane cylinders or carry matches, torches, etc.

Under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180), propane is regulated as a Division 2.1 (Flammable gas). This material is **Forbidden** to be offered for transportation or transported by passenger aircraft and passenger rail. However, § 173.29 states that empty packagings that meet certain provisions are not subject to the requirements of the HMR.

In the case of a propane stove, any internal reservoir areas and piping must be properly cleaned of residue and purged of vapors to remove any potential hazard to be considered as not regulated under the HMR. The methods and limits used for determining what qualifies as "cleaned and purged" under the HMR are intentionally not defined because they vary greatly depending on the properties of the particular hazardous material and type of packaging. In the case of propane, other variables such as purge medium, temperature conditions and internal volume are also factors. We would consider a stove to be sufficiently cleaned and purged when the vapors in any reservoir areas and piping are no longer capable of sustaining combustion. When a properly cleaned and purged propane container is offered for transportation by aircraft, the valve must be left open to preclude internal pressure buildup.

Air carriers of hazardous materials are subject to the applicable requirements of the HMR. The HMR specify conditions and constraints for offering and transporting hazardous materials in commerce. However, we have no authority to compel such transportation. Air carriers may establish their own non-conflicting internal policies and practices for accepting hazardous materials for transportation.

I hope this information is helpful.

Sincerely,

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



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James W. Stoddard
613 Andover Lane
Coppell, TX 75019-2858
Phone: 972-393-1636

May 6, 2002

Mr. Edward Mazzullo
Director of OHMS
USDOT/RSPA (DHM-10)
400 7th Street SW
Washington, D. C. 20590

Dear Mr. Mazzullo:

I am an International Chili Society competition chili cook and frequently fly to the events. I always check my chili luggage, including a Coleman propane camping stove. I never check the propane cylinders or carry any matches, torches, etc.

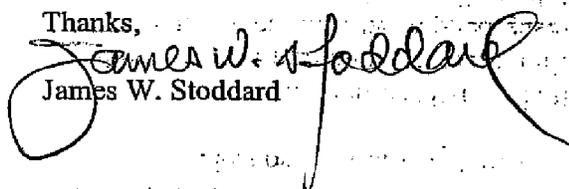
The problem, especially after "9-11", is that airlines (particularly South West), are reluctant (or prohibit) the transportation of these units as checked or carry-on baggage. Their misplaced concern is that there may be trapped gases that could cause a fire or explosion. You can see this would be a large problem for a chili cook traveling to participate in a cook-off with no stove.

This has been an on-going problem even before "9-11", so the International Chili Society elicited a letter from The Coleman Company's senior engineer (attached) stating there was no danger of trapped gases igniting/exploding. However, the airlines are taking exception to the term "marine vessel transport" in this correspondence pointing, out that it doesn't refer to aviation transport. I contacted Coleman and they refused to get further involved due to scope of authority and legal issues after "9-11".

What would be very helpful from you, if you agree there is no danger from the stove, is a letter from your office stating such. I think the more specific, the better, and a contact number the airlines may call to clear up any concerns or questions they may have. Maybe a published circular to the airlines might clear up this concern.

I look forward to your expeditious reply to this matter. I also maybe contacted at:
972-393-1636 (home)
972-393-0968 (fax)
AlienPilot3@attbi.com (email)

Thanks,


James W. Stoddard