



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

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

JUN 30 2006

Ms. Linda M. Bartram
DGSA, Shipping Manager
Nazdar Limited
7 Barton Road
Heaton Mersey Industrial Estate
Stockport SK4 3EG, Cheshire, England

Ref. No.: 06-0125

Dear Ms. Bartram:

This is in response to your letter requesting clarification of the requirements contained in the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, your questions address the HMR requirements applicable to air shipments of aerosols arriving in the United States from foreign origins. Your questions are paraphrased and answered as follows:

- Q1) May you export limited quantities of aerosols to the United States if the shipment conforms to the International Civil Aviation Organization (ICAO) Technical Instructions for the Transport of Dangerous Goods by Air (Technical Instructions) including the use of IP-7 and IP-7A inner packagings prescribed under Packing Instructions 203 and Y203?
- A1) Provided hazardous materials are transported in accordance with the provisions in § 171.11, the HMR authorize the use of the ICAO Technical Instructions for the transportation of hazardous materials by aircraft and by motor vehicle either before or after being transported by aircraft. Therefore, aerosols that conform to both the ICAO Technical Instructions and § 171.11, including the provisions in § 171.11(d)(14) requiring aerosols to meet the definition of an "aerosol" in § 171.8 and be in a metal packaging if the package exceeds 7.22 cubic inches, may be shipped to the United States and then transported by motor vehicle to their final destination.
- Q2) Do we need a certificate to prove the packagings are appropriate, or is it sufficient to simply pack the cans in a UN approved box?
- A2) If you choose to ship using the ICAO Technical Instructions then you must follow the requirements in those regulations, unless otherwise provided in § 171.11. Therefore, you must package the aerosols as provided in the ICAO Technical Instructions under Packing Instruction 203, Y203, or 910, as applicable. In



060125

addition, package certifications required by the ICAO Technical Instructions such as the UN test report, UN markings on a packaging, or a signed declaration on the dangerous goods transport document would apply.

- Q3) Would there be a problem distributing the IP-7 cans within the United States?
- A3) Under § 171.11, a hazardous material may be transported by aircraft, and by motor vehicle either before or after being transported by aircraft, if the transportation conforms to the ICAO Technical Instructions. However, if you choose to re-offer the aerosols for transportation by highway after they have already reached their final destination, then the IP-7/IP-7A cans, depending on pressure, may not conform to the HMR requirements. For domestic transportation aerosols must conform to the requirements contained in § 173.306(a)(3).
- Q4) Are IP-7/IP-7A inner packagings the same as Specification DOT 2P/2Q packagings?
- A4) Specification DOT 2P and DOT 2Q containers are DOT specification packagings. Though they are similar to IP-7 and IP-7A inner packagings, they are not the same as or interchangeable with IP-7 and IP-7A inner packagings.

I hope this information is helpful. Please contact us if you require additional assistance.

Sincerely,



John A. Gale
Chief, Standards Development
Office of Hazardous Materials Standards

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Supko
§ 178.33
§ 178.33a
Packagings
06-0125

FACSIMILE TRANSMITTAL SHEET

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|---|---|
| TO: HAZARDOUS MATERIAL REG. SPECIALIST | FROM: Linda M Bartram |
| COMPANY: HAZARDOUS MATERIALS INFORMATION CTR | DATE: WEDNESDAY, 17 MAY 2006 |
| FAX NUMBER: 001 202 366 3012 | TOTAL NO. OF PAGES INCLUDING COVER 1 |
| REFERENCE: HAZARDOUS SHIPMENT TO USA | |

Hi, I have accessed the information I require from your website, but could you just clarify something for me.

UN1950 - Aerosols, flammable

On the website information there are 2 specifications 2P and 2Q, do these relate to IATA/ICAO standards IP7 and IP7A? I have been totally confusing myself trying to convert the measurements in inches to millimetres. The IATA book states a requirement for IP7 at 0.18mm (0.007ins) & IP7A cans with a 0.2mm thickness (0.008ins).

The aerosols cans that we have are produced to IP7 standards, 0.19 mm thickness cans and pressure tested at 55 Deg C - 7.38 bar (107psi) and we need to be sure that we can export them to the USA without problem.

1. Can we use these cans for airfreight shipments using both Y203 and 203 or will we need to obtain special cans for the US market and if so what specifications and markings are required in order to meet the USA standards?
2. Or, if the cans we have are acceptable, do we need a certificate to prove the test requirements, or do we need to simply pack the cans in a UN approved box if the Limited Quantity packaging is not acceptable?
3. Would there be any problem with distribution within the USA of the IP7 cans presently in stock.

It would be much appreciated if you could assist me in this query.

Regards,

Linda M Bartram

(DGSA, Shipping Manager)