



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety Administration**

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

JUL 26 2006

Paul H. Brinton, MT (ASCP)
Vice President, Transportation
ARUP Laboratories
500 Chipeta Way
Salt Lake City, UT 84108-1221

Reference No. 06-0131

Dear Mr. Brinton:

This is in response to your June 2, 2006 e-mail to Mr. Edward Mazzullo, Director, Office of Hazardous Materials Standards, and telephone conversation with a member of my staff asking why when transported by aircraft up to 2.0 kg (4.4 pounds) of "Carbon dioxide, solid, 9, UN 1845, PG III" (Dry ice) is permitted per person in carry-on baggage but up to 2.3 kg (5.07 pounds) of the material is permitted per person in checked baggage under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180).

You are correct that the quantity of dry ice permitted in carry-on baggage and the quantity permitted in checked baggage should be the same. We intend to address the problem in an upcoming rulemaking.

You also asked how much dry ice may be used to refrigerate medical specimens without additional paperwork or shipping papers. Dry ice is not regulated when transported by highway or rail. In accordance with § 173.217 of the HMR, for air transportation, for each shipment exceeding 2.3 kg (5.07 pounds) per package, advance arrangements must be made with the air carrier. No more than 200 kg (441 pounds) of dry ice may be transported in any one cargo compartment or bin on any aircraft except by special arrangement with the air carrier. Dry ice is excepted from shipping paper and certification requirements provided the requirements in § 173.217 are met and the package is marked



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173-217
175.10 (a)(13)(i)

"Carbon Dioxide, Solid" or "Dry Ice" and marked with an indication that the material being refrigerated is used for diagnostic or treatment purposes.

I hope this information is helpful.

Sincerely,

A handwritten signature in black ink, appearing to read "Hattie L. Mitchell". The signature is fluid and cursive, with a long horizontal stroke at the end.

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

Edmerson
\$173.217
\$175.10(a)(13)(i)
Dry Ice
06-0131

From: Brinton, Paul [mailto:pbrinton@aruplab.com]
Sent: Friday, June 02, 2006 5:44 PM
To: Mazzullo, Ed <PHMSA>
Subject: Dry Ice Shipments

Ed, perhaps you or someone in your organization can help me. Information I have received indicates that up to 2.0 kg of dry ice may be included in carry on luggage, but up to 2.3 kg may be included in Checked bags. Is there some logic to that differentiation? Some airlines are using the difference and claiming a need to simplify their training to only allow 2.0 kg for either type of transport. That is creating a serious problem for us in the laboratory business, since there is a significant difference in the length of time 2.3 kg takes to sublime versus 2.0 kg. Also, can you tell me how much dry ice may be used for the refrigeration of medical specimens without additional paperwork or shipping papers. Thank you.

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