



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

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

SEP 12 2008

Mr. David Martin
Digital Innovations
3436 N. Kennicott, Suite 200
Arlington Heights, IL 60004

Ref. No. 08-0011

Dear Mr. Martin:

This responds to your January 2, 2008 request for clarification on the applicability of the Hazardous Materials Regulations (HMR: 49 CFR Parts 171-180) to your product.. Specifically, you ask if the exceptions in § 175.10 apply to the transportation of your product, a CO2 AirBlaster cleaning device, and its refill gas cartridges (cylinders).

The answer is no. The exceptions in §§ 175.10(a)(11) and 175.10(a)(12) are limited to small gas cylinders used for self-inflating life jackets or mechanical limbs under the conditions specified.

I hope this answers your inquiry.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan Gorsky".

Susan Gorsky
Acting Chief, Standards Development
Office of Hazardous Materials Standards

Boothe
§175.10
Air Exceptions
08-0011

Drakeford, Carolyn <PHMSA>

From: INFOCNTR <PHMSA>
Sent: Wednesday, January 02, 2008 1:00 PM
To: Drakeford, Carolyn <PHMSA>
Subject: FW:
Attachments: Co2 MSDS.doc

Request for letter of interp.

From: David Martin [mailto:dave@comclark.com]
Sent: Tuesday, January 01, 2008 9:29 AM
To: TSA-ContactCenter@dhs.gov
Cc: INFOCNTR <PHMSA>
Subject:

Dear TSA Customer Service and Hazardous Materials Information Center:

49 CFR - CHAPTER I - PART 175.10 (a)(11) indicates that a passenger may carry a Life Jacket fitted with no more than two small gas cartridges (containing no hazardous material other than a Div. 2.2 gas) for inflation purposes plus no more than two spare cartridges.

Likewise PART 175.10 (a)(12) provides that a passenger could wear a mechanical limb operated by "Small compressed gas cylinders of Division 2.2" and carry "spare cylinders of a similar size for the same purpose in sufficient quantities to ensure an adequate supply for the duration of the journey." Note that in this case they are not limited to no more than two such cartridges.

On your webpage <http://www.tsa.gov/travelers/customer/index.shtm> you say in part:

Our common-sense approach borrows and adapts the best ideas from business and industry. The goal is not just to make people feel safe, but to ensure that they really are safe.

In keeping with that concept, I request a Letter of Interpretation regarding my transporting the end user product:

Digital Innovations "AirDR® AirBlaster CO2™", a description of which is found here:

<http://www.digitalinnovations.com/products.php?id=28&checkCat=4&cat2=4&sub2=5>

I also wish to transport the refills for this device, which come in blister packs containing four such small gas cartridges, and which can be seen at the URL below, and thus I also request a Letter of Interpretation regarding the transportation of this product:

<http://www.digitalinnovations.com/products.php?id=29&checkCat=4&cat2=4&sub2=5>

The Material Safety Data Sheet for these cartridges from the manufacturer of this device is attached to this email.

The Hazard name is "Carbon dioxide" ; Hazard is 2.2; Class or Division is UN1013.

Since you are allowed to carry a greater amount of these cylinders than two if they are accompanied by a mechanical limb... you can carry "...sufficient quantities to ensure an adequate supply for the duration of the journey.",

it seems reasonable that carrying one or two of these four packs of refills for the Digital Innovations cleaning device would ensure the same level of safety.

Since I travel frequently to the Philippines, and need these cylinders for use there, where they are not available for purchase, I request this Letter of Interpretation that it is permissible to carry more than two of such cylinders in my checked or carryon baggage, or at the least a written clarification that I could present to baggage screeners agreeing that it permissible for me to carry the two refill cartridges without the accompanying life jacket.

Certainly a reasonable person or agency would not be able to say that passengers would be any less safe with these cylinders in baggage without the accompanying life jackets or mechanical limbs than they would be with such devices accompanying the cylinders. It is obvious to me that whoever wrote these rules simply did not foresee other uses for such cylinders other than life jackets or mechanical limbs, but such legitimate other usages do now exist.

It would seem to me to be unreasonable to assign any greater risk to such cartridges without a life jacket or mechanical limb accompanying them than would be present if there were a life jacket or mechanical limb accompanying them.

If your interpretation of the existing regulations does not support my contention that it is safe and permissible to carry such cylinders in checked or carryon baggage on passenger flights, then I request an exception from the regulations to be able to do so.

Thank you for your help.

--

Best Regards,

Dave Martin

CO₂ AIR BLASTER, 3010300
3010400

MATERIAL SAFETY DATA SHEET

SECTION 1 - PRODUCT AND COMPANY IDENTIFICATION

PRODUCT NAME: CARBON DIOXIDE, GAS
GENERAL USE: Aerosol propellant
PRODUCT DESCRIPTION: Odorless, colorless gas with slight acidic taste.



DISTRIBUTOR'S NAME Innovations In Cycling		DATE PREPARED: April 1, 2002		Page 1 of 4	
ADDRESS (NUMBER, STREET, P.O. BOX) 2700 E. Babby Rd. Bldg. C		SUPERSEDES: New		TELEPHONE NUMBER FOR INFORMATION (520) 255-3936	
(CITY, STATE AND ZIP CODE) Tucson, AZ 85706		COUNTRY USA		EMERGENCY TELEPHONE NUMBER CHEM • TEL (800) 255-3924 Outside USA (613) 248-0585	
MANUFACTURER'S NAME Not specified					
ADDRESS (NUMBER, STREET, P.O. BOX)				TELEPHONE NUMBER FOR INFORMATION	
(CITY, STATE AND ZIP CODE)		COUNTRY		EMERGENCY TELEPHONE NUMBER	

SECTION 2 - HAZARDOUS INGREDIENTS

HAZARDOUS COMPONENTS	CAS #	% (by weight)	OSHA PEL		ACGIH TWA		SARA TITLE III	RQ LBS
			PPM	MG/M ³	PPM	MG/M ³		
Carbon dioxide	124-38-9	100	5000	9000	30000	54000		

SECTION 3 - HAZARDS IDENTIFICATION

EMERGENCY OVERVIEW

Odorless, colorless nonflammable gas. Simple asphyxiant - this product does not contain oxygen and may cause asphyxia if released in a confined area. Maintain oxygen levels above 19.5%. Carbon dioxide exposure can cause nausea and respiratory problems. Contents under pressure. Use and store below 125° F. Hazard symbol None. Risk Phrase R20

POTENTIAL HEALTH EFFECTS

INHALATION: High concentrations are irritating to the respiratory tract; may cause headache, dizziness, nausea, vomiting and malaise.

SKIN: Not likely to cause a problem due to high volatility of product. Contact with liquid or rapidly expanding gases released under high pressure may cause frostbite.

EYES: Direct contact with concentrated vapor may cause minor irritation.

INGESTION: Not likely to cause a problem due to high volatility of product.

CARCINOGENICITY	NTP?	No	IARC MONOGRAPHY?	No	OSHA REGULATED?	No
------------------------	------	----	------------------	----	-----------------	----

MATERIAL SAFETY DATA SHEETPRODUCT NAME: CARBON DIOXIDE, GAS
April 1, 2002

Page 2 of 4

SECTION 4 - FIRST AID MEASURES

INHALATION: Remove affected person to fresh air; provide oxygen if breathing is difficult; if affected person is not breathing, administer CPR and seek emergency medical attention.

SKIN: Wash affected area with soap and water; if irritation persists, seek medical attention.

EYES: Remove contact lenses. Flush eyes with clear running water for 15 minutes while holding eyelids open; if irritation persists, seek medical attention.

INGESTION: Not expected under normal conditions due to gaseous state.

SECTION 5 - FIRE FIGHTING MEASURES**FLASH POINT (METHOD USED):**

Non-flammable

FLAMMABLE LIMITS

LEL: Not applicable

UEL: Not applicable

AUTOIGNITION TEMPERATURE: Not determined**NFPA CLASS:** None

GENERAL HAZARDS: Product is not flammable or combustible. Products of combustion include compounds of carbon, hydrogen and oxygen, including carbon monoxide.

EXTINGUISHING MEDIA:

Carbon dioxide, water, water fog, dry chemical, chemical foam

FIRE FIGHTING PROCEDURES:

Self-contained respiratory equipment; cool containers to prevent pressure buildup and possible explosion when exposed to extreme heat.

UNUSUAL FIRE AND EXPLOSION HAZARDS:

Closed containers can explode due to buildup of pressure when exposed to extreme heat. Contents under pressure. Do not use or store near heat sources.

HAZARDOUS COMBUSTION PRODUCTS:

Smoke, fumes, oxides of carbon

SECTION 6 - ENVIRONMENTAL RELEASE MEASURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED: Evacuate and ventilate area.

SECTION 7 - HANDLING AND STORAGE

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE: Keep container closed when not in use; protect containers from abuse; protect from extreme temperatures; keep away from sources of heat. Do not puncture container. Do not attempt to refill container. Maintain well ventilated work areas to minimize exposure when handling this material.

SECTION 8 - EXPOSURE CONTROLS / PERSONAL PROTECTION**ENGINEERING CONTROLS:**

The use of local exhaust ventilation is required to control emissions near the source. Provide mechanical ventilation of confined spaces. See Section 2 for Component Exposure Guidelines.

PERSONAL PROTECTION:

RESPIRATORY PROTECTION (SPECIFY TYPE): None required while threshold limits (Section 2) are kept below maximum allowable concentrations; if TWA exceeds limits, NIOSH approved respirator must be worn. Refer to 29 CFR 1910.134 or European Standard EN 149 for complete regulations.

PROTECTIVE GLOVES: Recommended for general protection

EYE PROTECTION: Protective eyeglasses or chemical safety goggles. Refer to 29 CFR 1910.133 or European Standard EN166.

OTHER PROTECTIVE CLOTHING OR EQUIPMENT: Safety eyeshield nearby

WORK / HYGIENIC PRACTICES: Practice safe workplace habits. Minimize body contact with this, as well as all chemicals in general.

MATERIAL SAFETY DATA SHEET

PRODUCT NAME: CARBON DIOXIDE, GAS
April 1, 2002

Page 3 of 4

SECTION 9 - PHYSICAL AND CHEMICAL PROPERTIES

VAPOR PRESSURE (MM Hg) 8.56 psia @ 20 ° C	VAPOR DENSITY (AIR = 1) 1.53
SPECIFIC GRAVITY (WATER = 1) Not available	EVAPORATION RATE (WATER = 1) < 1
SOLUBILITY IN WATER Very soluble	FREEZING POINT -69.8° F (-55.6° C)
pH Not available	APPEARANCE AND ODOR Colorless, odorless gas
BOILING POINT -109.3° F (-78.5° C)	PHYSICAL STATE Gas
VISCOSITY Gas	VOLATILE ORGANIC COMPOUNDS (Total VOC's) None

SECTION 10 - STABILITY AND REACTIVITY

STABILITY UNSTABLE STABLE: XXX	CONDITIONS TO AVOID: Extreme temperatures, open flames, sparks
INCOMPATIBILITY (MATERIALS TO AVOID): Strong oxidizers, strong acids	

HAZARDOUS DECOMPOSITION OR BYPRODUCTS: Decomposition will not occur if handled and stored properly. In case of a fire, oxides of carbon, hydrocarbons, fumes, and smoke may be produced.

HAZARDOUS POLYMERIZATION MAY OCCUR: WILL NOT OCCUR: XXX	CONDITIONS TO AVOID: None
---	---------------------------

SECTION 11 - TOXICOLOGICAL INFORMATION

Hazardous Ingredients	%	CAS #	LD50 of Ingredient (Specify Species and Route)	LC50 of Ingredient (Specify Species)
Carbon dioxide	100	124-38-9	Information not found	Information not found

SECTION 12 - ECOLOGICAL INFORMATION

No data are available on the adverse effects of this material on the environment. Neither COD nor BOD data are available. Based on the chemical composition of this product it is assumed that the mixture can be treated in an acclimatized biological waste treatment plant system in limited quantities. However, such treatment should be evaluated and approved for each specific biological system. None of the ingredients in this mixture are classified as a Marine Pollutant.

SECTION 13 - DISPOSAL CONSIDERATIONS

WASTE DISPOSAL METHOD: Dispose of in accordance with Local, State, and Federal Regulations. This product may produce concentrated hazardous vapors or fumes in a disposal container creating a dangerous environment. Refer to "40 CFR Protection of Environment Parts 260-299" for complete waste disposal regulations. Consult your local, state, or Federal Environmental Protection Agency before disposing of any chemicals. Do not flush to sanitary sewer or waterway.

SECTION 14 - TRANSPORT INFORMATION

PROPER SHIPPING NAME: Carbon dioxide

DOT HAZARD CLASS / Pack Group: 2.2	IATA HAZARD CLASS / Pack Group: 2.2
REFERENCE: 49 CFR 173.115, 306, 307	IMDG HAZARD CLASS: 2.2
UN / NA IDENTIFICATION NUMBER: UN 1013	RIDADR Dangerous Goods Code: 2.2
LABEL: NONFLAMMABLE GAS	UN TDG Class / Pack Group: 2.2
HAZARD SYMBOLS: None	

Note: Transportation information provided is for reference only. Client is urged to consult CFR 49 parts 100 - 177, IMDG, IATA, EC, United Nations TDG, and WHMIS (Canada) TDG information manuals for detailed regulations and exceptions covering specific container sizes, packaging materials and methods of shipping.

MATERIAL SAFETY DATA SHEET

PRODUCT NAME: CARBON DIOXIDE, GAS
 April 1, 2002

Page 4 of 4

SECTION 15 - REGULATORY INFORMATION**TSCA (Toxic Substance Control Act)**

Components of this product are listed on the TSCA Inventory.

SARA TITLE III (Superfund Amendments and Reauthorization Act)

311/312 Hazard Categories

Sudden release of pressure

313 Responsible Ingredients:

None

CERCLA (Comprehensive Response Compensation and Liability Act)

None

CPR (Canadian Controlled Products Regulations)

This product has been classified in accordance with the hazard criteria of the Controlled Products Regulations and the MSDS contains all the information required by the Controlled Products Regulations.

IDL (Canadian Ingredient Disclosure List)

Components of this product identified by CAS number and listed on the Canadian Ingredient Disclosure List are shown in Section 2.

DSL / NDSL (Canadian Domestic Substances List / Non-Domestic Substances List)

Components of this product identified by CAS number are listed on the DSL or NDSL and may or may not be listed in Section 2 of this document. Only ingredients classified as "hazardous" are listed in Section 2 unless otherwise indicated.

EINECS (European Inventory of Existing Commercial Chemical Substances)

Components of this product identified by CAS numbers are on the European Inventory of Existing Commercial Chemical Substances.

EC Risk Phrases

R20 Harmful by inhalation.

EC Safety Phrases

S38 In case of insufficient ventilation, wear suitable respiratory equipment.

SECTION 16 - OTHER INFORMATION

No specific notes.

HMS HAZARD RATINGS

HEALTH	1	0 = INSIGNIFICANT	3 = HIGH
FLAMMABILITY	0	1 = SLIGHT	4 = EXTREME
REACTIVITY	0	2 = MODERATE	

PERSONAL PROTECTIVE EQUIPMENT B. Safety Glasses, Gloves

REVISION SUMMARY:

This MSDS has been revised in the following sections:

No revisions available

MSDS Prepared by Chem-Tel, Inc.
 1305 N. Florida Ave.
 Tampa, Florida USA 33602
 (800) 256-3924 Outside USA (813) 248-0573

The information contained herein is believed to be accurate but is not warranted to be so. Data and calculations are based on information furnished by the manufacturer of the product and manufacturers of the components of the product. Users are advised to confirm in advance of need that information is current, applicable and suited to the circumstances of use. Vendor assumes no responsibility for injury to vendor or third persons proximately caused by the material if reasonable safety procedures are not adhered to as stipulated in the data sheet. Furthermore, vendor assumes no responsibility for injury caused by abnormal use of this material even if reasonable safety procedures are followed. Any questions regarding this product should be directed to the manufacturer of the product as described in Section 1.

SHOPPING CART

Search

ESSENTIAL TOOLS FOR TODAY'S ELECTRONIC PRODUCTS



HOME

PRODUCTS

LOG IN

MY ACCOUNT

RECEIVE OUR NEWSLETTER

TELL A FRIEND

Model Number: 30103

AirDR® AirBlaster CO2™

Blast away dust from cameras, keyboards, computers, A/V components, and office equipment with pinpoint accuracy.

- Pure, oil-free, anti-static CO2 gas delivers higher-velocity airflow than canned air
- Compact size housing with easy-to-replace 16-gram air cartridges
- Replacement cartridges available (four-pack, model 30104 00)



\$12.99
ADD TO CART

HARDWARE CARE DISC REPAIR DISC CARE



SkipDR™ Advanced Disc Repair System
Revive damaged music CDs, movie DVDs, game, photo and data discs in about a minute.

\$29.99
ADD TO CART



SkipDR™ AutoMax® Motorized Disc Repair System
Automatically fix scratched discs: Music CDs, movie DVDs, game, photo and data discs

\$39.99
ADD TO CART



CleanDR® Motorized Disc Cleaner
Ensure non-stop disc play by removing disc surface grime automatically

\$14.99
ADD TO CART



CleanDR® Screen Cleaner Microfiber Wand
Get the best picture possible from small screens such as laptops and smaller monitors.

\$7.99
ADD TO CART



CleanDR® Optical Lens Cleaner
Reduce skips and optimize CD, DVD and game system performance.

\$11.99
ADD TO CART



CleanDR® Screen Cleaner Kit
Clean all types of screens and electronics safely and easily for optimal viewing.

\$14.99
ADD TO CART

Page 1 of 2 ▶

COPYRIGHT 2005 DIGITAL INNOVATIONS. ALL RIGHTS RESERVED.

Home | About Us | News | Retailers | Support | Register | Products | Privacy Policy
Disc Repair | Disc Care | Home Theater | Office / Electronics Care | Gaming

ESSENTIAL TOOLS FOR TODAY'S ELECTRONIC PRODUCTS



HOME

PRODUCTS

LOG IN MY ACCOUNT RECEIVE OUR NEWSLETTER TELL A FRIEND

Model Number: 30104

AirDR® AirBlaster CO2™ 4-Pack Replacement Cartridges

Four, 16 gram, CO2 Replacement Cartridges.

- Pure, anti-static CO2 gas delivers higher-velocity airflow than canned air
- Oil-free air for delicate items such as photographic negatives and electronics
- Environmentally safe (no CFCs, HCFs) and non-flammable



\$9.99
ADD TO CART

DISC CARE HARDWARE CARE DISC REPAIR DISC CARE



SkipDR™ Advanced Disc Repair System
Revive damaged music CDs, movie DVDs, game, photo and data discs in about a minute.

\$29.99
ADD TO CART



SkipDR™ AutoMax® Motorized Disc Repair System
Automatically fix scratched discs: Music CDs, movie DVDs, game, photo and data discs

\$39.99
ADD TO CART



CleanDR® Motorized Disc Cleaner
Ensure non-stop disc play by removing disc surface grime automatically

\$14.99
ADD TO CART



CleanDR® Screen Cleaner Microfiber Wand
Get the best picture possible from small screens such as laptops and smaller monitors.

\$7.99
ADD TO CART



CleanDR® Optical Lens Cleaner
Reduce skips and optimize CD, DVD and game system performance.

\$11.99
ADD TO CART



CleanDR® Screen Cleaner Kit
Clean all types of screens and electronics safely and easily for optimal viewing.

\$14.99
ADD TO CART