



U.S. Department
of Transportation

Pipeline and Hazardous
Materials Safety
Administration

1200 New Jersey Avenue, SE
Washington, DC 20590

JUN 15 2017

Mr. Tony Amato
Technical Program and Safety Manager
Airborne Labs International, Inc.
22C World's Fair Drive
Somerset, NJ 08873

Reference No. 17-0009

Dear Mr. Amato:

This letter is in response to your January 30, 2017, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to cylinders. Specifically, you reference numerous requirements in Part 173 and ask whether a pressure relief device (PRD) is required when shipping "UN1080, Sulfur hexafluoride, 2.2" or "UN1013, Carbon dioxide, 2.2" in Department of Transportation (DOT) Specification 3E-1800 sample cylinders with volumes of 150cc, 300cc, and 500cc, respectively.

When shipping Division 2.2 non-flammable gases such as "UN1080, Sulfur hexafluoride, 2.2" or "UN1013, Carbon dioxide, 2.2" in DOT-3E-1800 sample cylinders, a PRD is required in accordance with the general requirements for cylinders in § 173.301(f). However, § 173.301(f)(7) provides an exception for smaller quantities of carbon dioxide shipped in DOT-3E cylinders. This paragraph excepts DOT-3E cylinders up to 12 inches in length containing less than 8 ounces (236.5 cc) of carbon dioxide from the PRD requirement.

I hope this information is helpful. Please contact us if we can be of further assistance.

Sincerely,

T. Glenn Foster
Chief, Regulatory Review and Reinvention Branch
Standards and Rulemaking Division

Andrews
§ 173.301
Packaging General
17-0009

Dodd, Alice (PHMSA)

From: INFOCNTR (PHMSA)
Sent: Tuesday, January 31, 2017 11:57 AM
To: Hazmat Interps
Subject: FW: interpretation 49CFR
Attachments: 02101DOTCompliant640x640v2.jpg

Importance: High

Hi Shante/Alice,

Please submit this as a letter of interpretation. Mr. Amato spoke with Eamonn.

Please let me know if you have any questions.

Thanks,
Jordan

From: Tony Amato [mailto:Tony.Amato@AIRBORNELABS.COM]
Sent: Monday, January 30, 2017 1:51 PM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Subject: interpretation 49CFR
Importance: High

To Whom It May Concern:

I was speaking to your Hazmat Specialist Eamonn
He helped me with my question on Sulfur Hexafluoride and Carbon dioxide

I need a written interpretation for this ruling when shipping UN 1080 in a 3E1800 sample cylinder. Also for Carbon dioxide UN 1013

He said to send an email to this address;

The size of the cylinder are 150cc; 300cc & 500cc double ended cylinder see attached picture

Does the cylinder valve need a PRD (pressure relief device) according to
§173.301 — General requirements for shipment of compressed gases and other hazardous materials in cylinders, UN pressure receptacles and spherical pressure vessels

§173.301(f)
§173.301(f)(2)
§173.301(f)(5)i
§173.301(f)(5)
§173.304a(2)

Regards

Tony Amato

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Airborne Labs International

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