



U.S. Department
of Transportation

Pipeline and Hazardous
Materials Safety
Administration

MAR 04 2008

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

Mr. Tom Magennis
Packaging Engineering
Hamilton Sundstrand
1 Hamilton Road
MS 2A-CC50
Windsor Locks, CT 06096

Reference No. 08-0042

Dear Mr. Magennis:

This is in response to your telephone conversations with Mr. Brian Moore, of the Pipeline and Hazardous Material Safety Administration's Office of Hazardous Materials Technology, and our February 26 telephone conversation, concerning the applicability of this Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) to a Refrigerating machine intended for use aboard an aircraft. The Refrigerating machine is fitted with a non-DOT specification cylinder containing about 10 pounds of 1,1,1,1 Tetrafluoroethane (Refrigerant gas R134a), a Division 2.2 (non-flammable gas) material, and is the subject of DOT-SP 14393.

Section 173.307, at paragraph (a)(4), provides that refrigerating machines containing 12 kg (25 pounds) or less of a non-flammable, non-toxic gas are not subject to the requirements of the HMR. Your company's refrigerating machines qualify under this provision. Therefore, a special permit is not necessary.

I hope this satisfies your request. If you have any further questions, please contact this office at (202) 366-8553.

Sincerely,

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

cc: Mr. John A. Andrea
Product Line Manager
Hamilton Sundstrand Corporation

Mitchell, Hattie <PHMSA>

From: MAGENNIS, TOM HS [TOM.MAGENNIS@hs.utc.com]
Sent: Tuesday, February 26, 2008 10:31 AM
To: Mitchell, Hattie <PHMSA>
Cc: Andrea, John A HS; MAGENNIS, TOM HS
Subject: Special permit 14393
Attachments: CRU 007.JPG; CRU 006.JPG

Mitchell
§173.307(a)(4)
Exceptions for Compressed Gas
in Cylinders
08-0042

Hattie,

As we discussed this morning, we are seeking to eliminate our special permit 14393 for our CRU/SCU assemblies under the exception cited in CFR 49 section 173.307 (4), (i). This article exempts refrigerating machines with less than 25 lbs of non-flammable gas, non, toxic gas to be shipped without being subject to higher level requirements.

I have enclosed two pictures of the CRU unit highlighting the Flash Tank which holds the refrigerant. Please review and advise if we can proceed with out the use of special permit to ship these units. <<CRU 007.JPG>> <<CRU 006.JPG>>

John Andrea's address is the same as mine with the exception of the MS.. John's is: 1-1-BC40

Regards,

Tom Magennis
Packaging Engineering
Hamilton Sundstrand
1 Hamilton Road
MS 2A-CC50
Windsor Locks, CT 06096
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2/26/2008