



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

JUN - 7 1999

Mr. Valois Pagan III
Dangerous Goods of America, Inc,
PO Box 590888
Miami, FL 33159-0888

Ref. No. 99-0098

Dear Mr. Pagan:

This is in response to your letter dated April 8, 1999, regarding the classification of aircraft engines. Specifically, you ask how an aircraft engine is classified when offered for air transportation and whether it requires a shipper's Declaration of Dangerous Goods; and if an engine is accompanied by a certificate of drainage, is a declaration required.

No person may offer a hazardous material for transportation unless the material is properly classified in accordance with the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). The classification of a hazardous material is the responsibility of the shipper (§ 173.22). Aircraft engines that are offered for transportation by air and have not been completely purged of fuel are subject to the HMR. The engine must be accompanied by a hazardous materials shipping paper (e.g. Declaration of Dangerous Goods) that includes the shipper's certification required by § 172.204. An aircraft engine that is completely purged of all flammable materials is not subject to the HMR.

I hope this satisfies your request.

Sincerely,

Thomas G. Allan
Acting Director, Office of Hazardous
Materials Standards



990098

173.220

DANGEROUS GOODS OF AMERICA, INC.

Nelson
§ 173.220
99-0098



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Mr. Edward Mazzulo
Department of Transportation
Dangerous Goods/Hazardous Materials
400 7th Street SW
Washington D.C. 20590

April 8, 1999

Dear Mr. Mazzulo,

Below I have asked two questions in reference to aircraft/jet engines and their respective classification:

Q: How do you classify an aircraft/jet engine when offered for air transport and does it require a Shipper's Declaration of Dangerous Goods?

Q2: If an aircraft/jet engine is accompanied by a "certificate of drainage", is a Shipper's Declaration of Dangerous Goods required for air transport?

Please respond in writing to:

Dangerous Goods of America
Mr. Val Pagan
P O Box 590888
Miami, FL 33159

Please do not hesitate to contact our office should you have any questions.

Best regards,


Valois Pagan III
Consultant