



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

NOV 19 1999

Mr. Frank Ramirez
Neiman Marcus Direct
111 Customer Way
Irving, TX 75039

Ref. No. 99-0297

Dear Mr. Ramirez:

This is in response to your letter dated October 28, 1999, regarding inner container pressure requirements for limited quantities of compressed gasses under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically you ask if an inner container meeting the requirements under § 173.306(a)(1) may be charged to a pressure exceeding 180 psig at 130°F.

The answer is yes. Inner containers shipped under the provisions of § 173.306(a)(1) have no pressure limits.

I hope this satisfies your request.

Sincerely,

Delmer F. Billings
Chief, Standards Development
Office of Hazardous Materials Standards



990297

173.3066

Neiman Marcus Direct

FRANK RAMIREZ
DIRECTOR OF DISTRIBUTION
972-401-6694 (OFFICE)
972-401-6764 (FAX)
214-992-5681 (PAGER)

BAH
§ 173.306
Facsimile

99-0297

To: Edward Mazullo
Director OHMS
US DOT / RSPA (DHM-10)
400 7th Street S.W.
Washington, D.C. 20590
@Fax: 202-366-3012
From: FRANK RAMIREZ
Date: 10/28/99
Re: Consumer Commodity
Pages: 1, including this

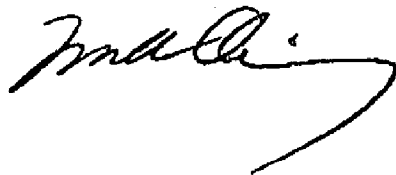
Mr. Mazullo,

I am reviewing the mailability of a product described as a screwless wine opener and refills (15 grams) which contain the chemical 1,1,1,2 Tetrafluoroethane or refrigerant gas R134A. The class/division is 2.2. ID number is UN3159. It is a nonflammable gas. The product qualifies as a Consumer Commodity ORM-D. One question I have is in the interpretation of CFR49 173.306 (a) (3) (ii), which states "pressure in the container must not exceed 180 psig at 130 degrees F." The product has a psig of 198.7 at 130 degrees F.

I talked to Arthur at the DOT 800 number. He clarified the fact that in paragraph (h) of section 173.306 that the product in limited quantity conforms with (a) (1) allowing (a) (3) (ii) to be a non-issue.

Mr. Mazullo, I would appreciate a confirmation letter from your office of this fact for my files. Please fax it to my attention at 972-401-6764. If you require any additional information, please call me at 972-401-6694.

Sincerely,



*Per convo w/ Arthur Pollock,
the container is less than 4 fluid
oz and is shipping under 173.(a)(1).*