



U.S. Department
of Transportation
**Research and
Special Programs
Administration**

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

SEP - 1 2000

Mr. Joseph Feldschuh, MD
350 Fifth Ave., Suite 7120
New York, NY 10118

Ref. No. 00-0221

Dear Mr. Feldschuh:

This is in response to your letter dated August 4, 2000, concerning the registration requirements in 49 CFR 107.601. Specifically you ask if you are required to register with the DOT if you ship or transport one or two syringes containing Albumin I-131, a radioactive material requiring a RADIOACTIVE YELLOW II label.

In order to be required to register for Class 7 hazardous materials other than highway route controlled quantities, you must offer or transport an amount of hazardous material that requires placarding. Since placarding is not required for Class 7 materials properly labeled "RADIOACTIVE YELLOW II," you are not required to register.

I hope this satisfies your request.

Sincerely,

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



000221

107,601

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JOSEPH FELDSCHUH, M.D., F.A.C.P., F.A.C.C.

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Registration/RAM
00-0221
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August 4, 2000

Edward T. Mazzullo
Director OHMS
USDOT/RSPA (OHM-10)
400 Seventh St. SW
Washington, DC 20590-0001

Attn: Jeff Furr

sent via fax and mail

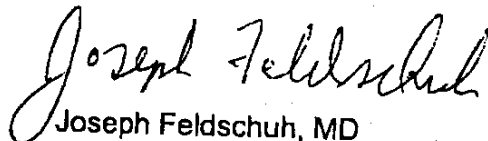
Dear Mr. Mazzullo:

I spoke to Mr. Furr of your staff concerning registration requirements for hazardous material. I am a physician and holder of a New York City license to receive radiation material. Specifically, I receive Albumin I-131 manufactured by the IsoTex Corporation in a single unit dose called Volumex (insert enclosed). The maximum shipped dose per unit is 25 microcuries and up to 6 units are contained within a single package. Shipments are labeled by the manufacturer as yellow 2. Recently another licensed facility that uses this product has asked if I would be willing to provide one or two injection syringes if their supply suddenly ran low.

I therefore contacted Mr. Furr to find out if I required a USDOT registration. Mr. Furr reviewed with me the current requirements as well as the current labeling requirements for shipping Volumex. He informed me that I would not have to register with the Department of Transportation for a license in the event that I wish to transport a Volumex syringe to another licensed facility.

I have requested some written confirmation from Mr. Furr of this matter so that I could have it in my file in the event a situation occurred where I received a request to send a syringe to another facility. Thank you for your assistance in this matter.

Sincerely yours,


Joseph Feldschuh, MD