



U.S. Department
of Transportation

Pipeline and Hazardous Materials
Safety Administration

1200 New Jersey Ave., SE
Washington, DC 20590

AUG 26 2009

Mr. Gene Sanders
Thermo Fisher Scientific
2000 Park Lane
Pittsburgh, PA 15275

Ref. No. 09-0070

Dear Mr. Sanders:

This responds to your e-mail requesting confirmation that your company's High Pressure Liquid Chromatography (HPLC) column is not regulated under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). According to your e-mail, the HPLC columns are constructed of steel tubing and filled with inert packing material that is wetted with a flammable liquid. The columns contain no free-flowing liquid and the ends are sealed with caps or plugs.

Based on the information provided in your e-mail, it is the opinion of this Office that your company's HPLC columns are in a quantity and form that do not pose a risk in transportation. Therefore, the HPLC columns are not regulated under the HMR.

I trust this satisfies your inquiry. Please contact us if we can be of further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Hattie L. Mitchell".

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

Stevens
 §172.1
 §172.101

Drakeford, Carolyn <PHMSA>

From: Gorsky, Susan <PHMSA>
Sent: Tuesday, March 24, 2009 3:18 PM
To: Drakeford, Carolyn <PHMSA>
Subject: FW: Reply to your e-mails of 4/25/08 and 3/9/09
Attachments: HPLC column LARGE.jpg; HPLC columns.jpg; Thermo HPLC column.jpg

Applicability
 09-0070

From: Ke, Charles <PHMSA>
Sent: Tuesday, March 24, 2009 2:35 PM
To: Gorsky, Susan <PHMSA>
Cc: Ke, Charles <PHMSA>; Sanders, Gene; Richard, Bob <PHMSA>; Hochman, Charles <PHMSA>
Subject: FW: Reply to your e-mails of 4/25/08 and 3/9/09

Susan,

Per the e-mail below, Mr. Sanders is requesting an interpretation letter to clarify the issue of transporting HPLC columns. I agree with Mr. Sanders that the HPLC columns are not hazardous materials. I have drafted the following as input to the interpretation letter:

"You stated that a HPLC (High Pressure Liquid Chromatography) column constructed from steel (metal) tube filled with inert packing materials which are wetted with liquids. There is no free flowing liquid in the column and the ends of the column are sealed with caps or plugs. You further stated that such a HPLC column is not subject to the requirements of HMR." "We agree with you that it is not regulated".

My drafted wordings are not exact but to provide you with the necessary information for drafting a formal reply.

Charles Ke

From: Sanders, Gene [mailto:gene.sanders@thermofisher.com]
Sent: Tuesday, March 17, 2009 5:02 PM
To: Ke, Charles <PHMSA>; Richard, Bob <PHMSA>
Cc: Mayfield, John
Subject: RE: Reply to your e-mails of 4/25/08 and 3/9/09

Dr. Ke,

Yes, we would like an interpretation that HPLC columns filled with flammable liquid are not subject to the HMR.
 Yes, once they are inside the columns the 'liquids' will not flow.
 Yes, HPLC columns are shipped with caps or plugs on the ends.

Dr. Richard,

Per your e-mail, some photos are attached.

Thank you both for your continuing assistance.

Cheers,
 Gene S.
 ---;==;<

3/24/2009