



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

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

FEB 27 2003

Mr. John Szymanski
Design/Development Engineer
Carleton Technologies, Inc.
10 Cobham Drive
Orchard Park, NY 14127-4195

Reference No.: 03-0029

Dear Mr. Szymanski:

This is in response to your letter requesting clarification of the limited quantity exception for "Helium, compressed, 2.2, UN 1046" under the Hazardous Materials Regulations (HMR; 49 CFR parts 171-180). Your letter states that the helium is in non-refillable cylinders with a capacity of two cubic inches, at a pressure of 7,000 psig, and will be transported by motor vehicle.

When transported by highway, § 173.306(a)(1) excepts limited quantities of certain compressed gases from labeling (except when intended for further transportation by air) and the specification packaging requirements when packaged in containers of not more than 4 fluid ounces capacity (7.22 cubic inches or less) except cigarette lighters. Each package must conform to the general requirements in §§ 173.24 and 173.24a, and may not exceed 30 kg (66 pounds) gross weight. In addition, shipments of compressed gases packaged in limited quantities must meet all other requirements in the HMR from which they have not been excepted.

I hope this satisfies your request.

Sincerely,

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



030029

173.306

CARLETON

Carleton Technologies Inc

10 Cobham Drive
Orchard Park, New York 14127-4198
Telephone 716-662-0006
FAX 716-662-0747

Corbin
\$173.306
Limited Quantities
03-0029

February 5, 2003

U.S. Department of Transportation
400 7th Street SW
Washington, DC 20590-0001
Attention: DHM-10

Attention: Edward T. Massullo
Director, Office of Hazardous Materials Standards
USDOT/RSPA, DHM-10

Subject: Request for Letter of Interpretation

Dear Mr. Massullo:

Carleton Technologies Inc. requests a letter of interpretation on Carleton P/N B44636-3 (assembled, shipped level) and B44637-1 (filled bottle subassembly level) to ship under CFR 49 section 173.306 Limited quantities of compressed gases.

The P/N in question is B44637-1 is a cylinder 2 cubic inches in volume and will be filled with compressed Helium, UN1046, at 7,000 psig. Helium has a Hazard class of 2.2. I have talked with Transportation Regulation Specialist Helen Engrum and Mechanical Engineer Mark Toughiry about the shipping regulations concerning B44637-1 and B44636-3. Both individuals have verbally explained that shipping our part number falls under section 176.306 Limited quantities of compressed gases section (a)(1). Section (a)(1) provides exceptions to most regulations "when in containers of not more than 4 fluid ounces capacity (7.22 cubic inches or less)..."

My request is to have a letter of interpretation for our files and for shipping purposes explaining that we can ship by truck in packages weighing no more than 66 pounds per 173.306. If you require more information pertaining to this matter, please call at 716-667-6277.

Sincerely,



John Szymanski
Design/Development Engineer