



U.S. Department  
of Transportation

Pipeline and Hazardous Materials  
Safety Administration

1200 New Jersey Ave., SE  
Washington, DC 20590

JAN 20 2010

Mr. Changsik Ko  
United Airlines c/o  
Incheon Customer Service  
#2075 Incheon International Airport  
Passenger Terminal  
2851 UnSeo-Dong, Joong-Gu  
Incheon, South Korea

Ref. No. 09-0280

Dear Mr. Ko:

This responds to your e-mail to Ms. Janet McLaughlin of the Federal Aviation Administration's Office of Hazardous Materials regarding the applicability of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) to "empty" or "new" lighters carried aboard an aircraft by a passenger or crew member. You ask if the regulatory requirements apply equally to new, unused or empty unpressurized wick-style (e.g., Zippo<sup>®</sup>) and refillable type lighters.

The answer is yes. Under §172.102(c)(1) Special Provision 168 of the HMR, a lighter that is new, unused or is cleaned of all residue and purged of vapors is not subject to the HMR. This applies whether the lighters are carried aboard on one's person or placed in checked baggage. Additionally, because the lighters are not subject to the HMR, there are no restrictions on the number that may be carried aboard on one's person or in their checked baggage.

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

Sincerely,

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

**Drakeford, Carolyn (PHMSA)**

**From:** Betts, Charles (PHMSA)  
**Sent:** Wednesday, November 25, 2009 7:12 AM  
**To:** Drakeford, Carolyn (PHMSA)  
**Subject:** FW: Zippo Lighters

**Importance:** High

Stevens  
§ 173.308  
§ 172.102 SP 168  
Lighters  
09-0280

Carolyn,  
Please log this in as a new request for interpretation.

Thanks,  
Charles

-----Original Message-----

From: Janet.McLaughlin@faa.gov [mailto:Janet.McLaughlin@faa.gov]  
Sent: Friday, November 20, 2009 5:49 AM  
To: Betts, Charles (PHMSA)  
Subject: Fw: Zippo Lighters

I think this is more an interp question.

Janet McLaughlin  
Federal Aviation Administration  
Office of Hazardous Material  
Div Manager, International and Outreach Div Cell 202-437-7651 Office 202-385-4897 This  
is from my BlackBerry

----- Original Message -----

From: "Ko, Changsik [ICNCS]" [CS.Ko@united.com]  
Sent: 11/19/2009 06:13 PM MST  
To: Janet McLaughlin; "DG-Bag-Discrepancy" <dg-bag-discrepancy@united.com>  
Cc: "Chang, Ohjae [ICNOZ]" <OJ.Chang@united.com>; "Kim, SE [ICNCS]" <SE.Kim@united.com>;  
"Kim, Inkyung [ICNCS]" <Inkyung.Kim@united.com>; "Park, Jinchul [ICNCS]"  
<JC.Park@united.com>  
Subject: RE: Zippo Lighters

Dear Janet ,

How are you

Could you tell me some details about lighters especially on the "Zippo Lighter".  
what I understand is that empty lighters are permitted in checked baggage.  
If this is right , empty zippo lighter also can be checked in customer\*s checked baggage?  
and how many per person or per checked bag ?

and please advise me some guidelines for the word "empty"lighter or "new"lighter for the  
acceptanc or rejection of these lighter types on the spot.

Thank you

Changsik,Ko

Incheon  
Customer Service

**Betts, Charles (PHMSA)**

**From:** Ko, Changsik [ICNCS] [CS.Ko@united.com]

**Sent:** Tuesday, November 24, 2009 7:10 PM

**To:** Betts, Charles (PHMSA)

**Subject:** RE: Zippo lighters

Dear Charles,

I was waiting your reply.  
Belows are the additional contact information

- Email : [cs.ko@ual.com](mailto:cs.ko@ual.com)
- Fax : 82-32-744-6676
- Office Phone : 82-32-744-6688
- Cell Phone: 82-11-9767-0023

Thank you for your response

Regards  
Changsik,Ko (Mr.)

-----Original Message-----

**From:** charles.betts@dot.gov [mailto:[charles.betts@dot.gov](mailto:charles.betts@dot.gov)]

**Sent:** Tuesday, November 24, 2009 10:26 PM

**To:** Ko, Changsik [ICNCS]

**Cc:** Janet.McLaughlin@faa.dot.gov

**Subject:** Zippo lighters

**Importance:** High

Good morning Ms. Ko,

Your request for interpretation of the Hazardous Materials Regulations was forwarded to my office for a formal response. However, in order to log your request into our tracking system, I need some additional contact information (i.e., complete mailing address, fax number and telephone number). Once received, your request will then be logged into our database and assigned to a specialist for handling. A formal response typically takes about 4 to 6 weeks.

Regards,  
Charles Betts  
Chief, Standards Development  
Office of Hazardous Materials Standards  
Pipeline and Hazardous Materials Safety Administration