



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

DEC 17 1999

Ref. No. 99-0318

Ms. Kathryn Parham
Printronic
Customer Administration
14600 Myford Rd
Irvine, CA 92623-9559

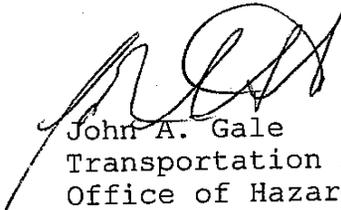
Dear Ms. Parham:

This is in response to your letter dated November 19, 1999, requesting clarification regarding the applicability of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) to the transportation of accumulators. Specifically, you ask if the HMR apply to replacement accumulators not assembled in machinery and accumulators transported in assembled machinery.

As provided by § 173.306(f)(1), accumulators which are installed in assembled machinery and constructed with a burst pressure of at least five times their charged pressure at 70°F are not subject to the HMR. Accumulators, as described in § 173.306(f), not in assembled machinery are subject to the HMR. However, accumulators intended to function as shock absorbers, struts, gas spring, pneumatic springs or other impact or energy-absorbing devices are not subject to the HMR provided they meet the criteria specified in § 173.306(f)(4).

I hope this satisfies your request.

Sincerely,


John A. Gale
Transportation Regulations Specialists
Office of Hazardous Materials Standards



990318

173.306

14600 Myford Road, P.O. Box 19559
Irvine, California 92623-9559
Telephone (714) 368-2300
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http://www.primtronix.com

Mollie
Approved Sending
on 11/16/99

11/16/99

Department of Transportation
Attention DHM-31
Associate Administrator for Hazardous Materials Safety,
research and Specials Programs Administration
United States of America Department of Transportation
Washington, D.C. 20590

AL Roberts →
Del. Pringle →
Linda Booth →

202 366 - 4470

Doug Smith (202) 366 4432

REF: D.O.T. Shipping Regulations

Standards-

Tech- 202 366-4545- Charlie
Hockman

I have attached a copy of the current Material Safety Data sheet for shipment of Gas Spring Assy's via air to several international locations. Please review the attached documentation and advise / confirm if this product is a dangerous good when:

- * 1. Shipped individually as just gas springs to be used for replacement parts.
- * 2. Shipped when installed on a Computer Printer Unit, generally two gas springs per printer.

Please provide a regulatory reference and any exemptions that may be used.

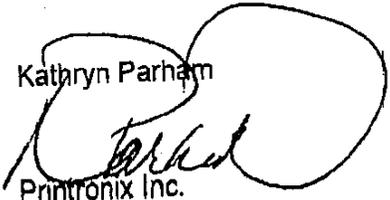
If you require additional information, I may be reached at (714) 368-2956.

Please forward all information to:

Printronic Inc.
14600 Myford Road
Irvine, CA 92606
Attn: Kathryn Parham

Standards - (has request)
↓
(202) 366-8553 Del Billing

Thank you advance for your time and consideration.

Kathryn Parham

Printronic Inc.
Export Compliance