



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

AUG 22 2006

Ms. Linda M. Bartram
DGSA, Shipping Manager
Nazdar Limited
7 Barton Road
Heaton Mersey Industrial Estate
Stockport SK4 3EG, Cheshire, England

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

Ref. No.: 06-0161

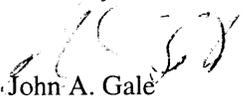
Dear Ms. Bartram:

This is in response to your letter requesting clarification of the requirements contained in the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if 0.19 mm aerosol cans filled with 400 ml of flammable liquid and tested to a pressure of 107 psig at 131 °F may be transported in the United States under § 173.306.

Section 173.306(a)(3)(ii) requires aerosols pressurized to more than 140 psig but not exceeding 160 psig at 130 °F to be transported in a specification DOT 2P inner metal container. For pressures exceeding 160 psig at 130 °F a specification DOT 2Q inner metal container must be used. Because you are pressurizing the container to 107 psig at 131 °F you are not required to use a specification DOT 2P or 2Q inside packaging. Provided your container otherwise complies with the HMR, including the provisions in § 173.306, it may be used for domestic transportation of aerosols.

I hope this information is helpful. Please contact us if you require additional assistance.

Sincerely,


John A. Gale

Chief, Standards Development
Office of Hazardous Materials Standards



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178.33a

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Supko
\$178.33
\$178.33a
Packagings Specs
06-0161

FACSIMILE TRANSMITTAL SHEET

TO: HAZARDOUS MATERIAL SPECIALIST	FROM: Linda M Bartram
COMPANY: PIPELINE & HAZARDOUS MATERIAL SAFETY	DATE: TUESDAY, 18 JULY 2006
FAX NUMBER: 001 202 366 3012	TOTAL NO. OF PAGES INCLUDING COVER: 1
REFERENCE: AEROSOL QUERY	

Dear Sir/Madam

Thank you for your letter ref: 06-0125 of 30th June.

I would however like clarification on one point.

Our aerosols meet IATA standards but I need to be sure that they also meet the standards required for domestic US transport.

The cans themselves are 0.19mm in thickness filled with 400ml of flammable liquid and test to a pressure of 7.38 bar at 55°C (107psi @ 131°F).

Although they are within the Limited Quantity scope of the IATA regulations we have recently been packing them in UN approved boxes, due to the increasing number of airlines that will not take LQ packaging.

Question – would these cans meet the requirements for domestic transportation within the USA, not including transport from the airport to the receiver, but for distribution throughout the USA.

Regards,

Linda M Bartram

(DGSA, Shipping Manager)