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

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

FEB 18 2000

Ref. No. 00-0028

Mr. Les Adolph
Sr Manager-Hazardous Materials Transportation Programs
Trans World Airlines, Inc.
9200 N.W. 112th Street
P.O. Box 20126
Kansas City, MO 64195

Dear Mr. Adolph:

This is in response to your letter dated January 17, 2000, regarding the proper shipping description for crew member personal breathing equipment (PBE) manufactured by Essex PB&R Corporation. Specifically, you ask if the proper shipping description for the PBE described in your letter is "Life-saving appliance, not self-inflating, 9, UN3072."

Under 49 CFR 173.22, it is the shipper's responsibility to properly describe a material in accordance with Parts 172 and 173. Such determinations are not required to be verified by this Office. In your letter, you describe a PBE which contains two small compressed oxygen cylinders, each having a volumetric capacity of approximately 3.3 ounces, and approximately 0.2 kilograms of lithium hydroxide, and otherwise complies with the conditions and limitations of § 173.219. We agree that the proper shipping name for this article is "Life-saving appliance, not self-inflating, 9, UN3072." In addition, it is our opinion that the limitations in § 175.85(i)(1) and (2) which limit the number of cylinders of compressed oxygen in certain cargo compartments do not apply to articles which may be described as "Life-saving appliance, not self-inflating."

I trust this information is of use to you. If we can be of further assistance, please contact us.

Sincerely,

Edward T. Mazzullo
Director, Office of Hazardous Materials Standards