



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

SEP 24 2002

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

Mr. Tom Brooks
Materials Manager
Bioject, Inc.
7620 S.W. Bridgeport Road
Portland, Oregon 97224

Ref. No. 02-0193

Dear Mr. Brooks:

This responds to your letter concerning certain carbon dioxide cylinders that are used in a medical device to administer needle-free injections. Specifically, you ask if the cylinders may be carried on board a passenger-carrying aircraft in checked or carry-on luggage under the exception in § 175.10(a)(4)(i) of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180).

Our December 13, 2000 reply (Reference Number 00-0206) to Alaska Airlines remains valid. In that letter we stated that it is our opinion the cylinders may be carried aboard passenger-carrying aircraft in checked or carry-on luggage under the provision in § 175.10(a)(4)(i). We also stated that the devices do not qualify for the exceptions in §§ 175.10(a)(18) and 175.10(a)(25).

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



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DEC 13 2000

Mr. Tom Brooks
Bioject, Inc.
7620 SW Bridgeport Road
Portland, OR 97224

Dear Mr. Brooks:

Thank you for providing us technical specifications for the Bioject 2000 Needle-Free Injection Management System.

Based on our evaluation of the Bioject 2000 Needle-Free Injection Management System, it is our opinion that this product may be carried aboard passenger-carrying aircraft in checked or carry on luggage under the provisions in 49 CFR 175.10(a)(4)(i).

A copy of our response to Alaska Airlines is enclosed. We are returning the confidential information which you provided and appreciate your making this information available to us.

Sincerely,

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

Enclosure



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DEC 13 2000

Ms. Marilyn Dirx
Manager, Dangerous Goods Compliance
Alaska Airlines
Box 68900
Seattle, WA 98168-0900

Reference No.: 00-0206

Dear Ms. Dirx:

This is in response to your July 24, 2000 letter concerning certain carbon dioxide cylinders that are used in a medical device to administer needle-free injections. Specifically, you asked if the cylinders may be carried on board a passenger aircraft in checked or carry-on luggage under the exception in § 175.10(a)(4)(i), 175.10(a)(18) or § 175.10(a)(25) of the Hazardous Materials Regulations (49 CFR Parts 171-180). I apologize for the delay and any inconvenience it may have caused.

Based on our review of information provided by a manufacturer of these medical devices, it is our opinion that the cylinders may be carried aboard passenger-carrying aircraft in checked or carry-on luggage under the provision in § 175.10(a)(4)(i). The devices do not qualify for the exceptions in §§ 175.10(a)(18) and 175.10(a)(25). The Federal Aviation Administration is in agreement with this position.

Should you have further questions, please contact this office.

Sincerely,

Edward T. Mazzullo
Director, Office of Hazardous Materials Standards