



U.S. Department  
of Transportation

1200 New Jersey Avenue SE  
Washington, DC 20590

**Pipeline and Hazardous  
Materials Safety  
Administration**

**JUL 17 2012**

Ms. Nina Ximena Artime  
Hazardous Control Inc.  
8600 NW 72 Street  
Miami, FL 33166

Ref. No. 12-0076

Dear Ms. Artime:

This responds to your March 20, 2012 request for clarification regarding the transportation by vessel of compressed oxygen under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if you are required to package cylinders containing "UN 1072, Oxygen, compressed, 2.2, 5.1" in an outer package that meets the "DOT31FP" specification.

The answer to your question is no. In accordance with §§ 173.302(f) and 173.304(f) compressed oxygen and oxidizing gases transported by aircraft must meet certain requirements. Specifically, these requirements include placing the cylinder in a rigid outer packaging meeting the requirements of §§ 173.302(f)(3) and 173.304(f)(3) respectively. The requirements in §§ 173.302(f) and 173.304(f) are applicable to shipment of compressed oxygen by aircraft, not by vessel.

I hope this answers your inquiry. If you need further assistance, please contact this office at (202) 366-8553.

Sincerely,

Robert Benedict  
Chief, Standards Development Branch  
Standards and Rulemaking Division

**Drakeford, Carolyn (PHMSA)**

Booth  
§173.302(f)  
§173.304(f)

**From:** Edmonson, Eileen (PHMSA)  
**Sent:** Tuesday, March 20, 2012 3:49 PM  
**To:** Lawson, Eleanor (PHMSA)  
**Cc:** Drakeford, Carolyn (PHMSA)  
**Subject:** RE: UN1072 - Ocean transport clarification

Cylinders  
12-0076

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**From:** [hazardous-control@hotmail.com](mailto:hazardous-control@hotmail.com) [<mailto:hazardous-control@hotmail.com>] **On Behalf Of** HAZARDOUS CONTROL  
**Sent:** Tuesday, March 20, 2012 3:29 PM  
**To:** Lawson, Eleanor (PHMSA)  
**Subject:** UN1072 - Ocean transport clarification

Good day Eleanor,

I hope everything is going well with you, again I need your help with some HAZMAT question.

I need to ship by **ocean** in a full container 1 Box - UN1072, my question is:  
Do we need package in an outer package that meets the DOT31FP specification?

Cylinders containing Oxygen, compressed, UN 1072; Compressed gas, oxidizing, n.o.s., UN 3156; Liquefied gas, oxidizing, n.o.s., UN 3157; Nitrogen trifluoride, UN 2451; or Nitrous oxide, UN 1070 must be packaged as required by 49 CFR 173.302(f) and 173.304(f) and be placed in a rigid outer packaging that meets specified flame penetration and thermal resistance requirements as prescribed in Appendices D and E of 49 CFR Part 178. This requirement does not apply to cylinders containing medical-use compressed oxygen transported in accordance with US Variation 15.  
Thanks a lot for your continuous support.

**Wishing you a very happy Saint Patrick's month, full of good luck!**  
Thanks for choosing Hazardous Control as your company for all your HazMat needs!

**Safe and prevention is our principal goal!**

Best Regards,

Nina Ximena Artime

**Hazardous Control Inc.**

(305) 477 1380 . Office  
(786) 363 2630 . Fax  
(786) 380 0234 . 24 Hr. Emergency  
8600 NW 72 ST, Miami, FL 33166  
P.O.Box 522013, Miami, FL 33152  
Email: [customerservice@hazardouscontrol.com](mailto:customerservice@hazardouscontrol.com)  
Msn: [hazardous-control@hotmail.com](mailto:hazardous-control@hotmail.com)  
Please visit us at: [www.hazardouscontrol.com](http://www.hazardouscontrol.com)