



U.S. Department
of Transportation

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

**Pipeline and
Hazardous Materials Safety
Administration**

JAN 17 2006

Mr. David Stone
Photographic Solutions, Inc.
7 Granston Way
Buzzards Bay, MA 02532

Ref. No. 05-0304

Dear Mr. Stone:

This is in response to your November 28, 2005 letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Your company produces a liquid cleaning solution used by photographers. The cleaning solution consists of 100% purified methanol, and is packaged in 2 oz. (59 ml) plastic receptacles. Specifically, you ask if passengers may transport your company's product in checked or carry-on baggage aboard aircraft.

A passenger may not transport a hazardous material in checked or carry-on baggage unless the material meets one of the exceptions in § 175.10. Methanol is listed in the Hazardous Materials Table (HMT; § 172.101) as a Class 3 (Flammable liquid) material, and does not meet any of the exceptions specified in § 175.10. Therefore, your product is not permitted to be carried aboard an aircraft in a passenger's checked or carry-on baggage under the HMR.

Sincerely,


John A. Gale

Chief, Standards Development
Office of Hazardous Materials Standards



050304

175.10

Drakeford, Carolyn <PHMSA>

From: david stone [david@photosol.com]
Sent: Monday, November 28, 2005 12:52 PM
To: Drakeford, Carolyn <PHMSA>
Subject: air traveling with flammable liquid in small qtty's

*Eichenlaub
\$175.10
Air Exceptions
05-0304*

Dear USDOT,

My company sells a liquid cleaner (called Eclipse) consisting of 100% purified methanol sold in 2 oz (59mL) plastic dropper bottle containers. It is used by professional and amateur photographers in conjunction with our Sensor Swab Digital Imaging Chip Cleaner (a fancy Q-tip with no chemicals) . A new, unopened bottle has a foil seal across the neck designed to be leak proof and a plastic screw cap to protect the seal. The cap must be turned approximately 2 full rotations to be removed. The bottle is a white HDPE plastic which is impervious to the chemical.

As many of these photographers need to travel, and need to carry a cleaning kit with them to use while shooting, the question has come up as to whether or not such a container would be permissible to bring in carry-on or in checked luggage. It appears that some TSA checkpoints do not allow it and others look at the container and have no issue with it.

I am hoping that DOT can clarify in writing its position so I can advise my customers accordingly.

An MSDS and other product information can be found on our company web site at :

<http://www.photosol.com>

or please feel free to contact me at (508) 759 2322.

Thank-you.

David M. Stone, PHOTOGRAPHIC SOLUTIONS, INC.
<http://www.photosol.com>
7 Granston Way Buzzards Bay, MA 02532
(508) 759-2322 phone ; E.S.T or E. D. T.

use this i-name to contact me personally. It is spam proof !!!
<http://public.xdi.org/=David.Stone>

11/28/2005