

## Important Information Regarding Security Screening of POC's

Recently heightened security measures have prompted questions surrounding the use of Portable Oxygen Concentrators (POCs) onboard commercial flights. According to the Department of Homeland Security, POCs have been and are still allowed through security checkpoints once they have been screened. All disability-related equipment, aids, and devices continue to be allowed through security checkpoints once cleared through screening.

Any respiratory equipment that Security Officers cannot clear by inspection will not be permitted into the sterile area.

Oxygen users connected to oxygen should inform the Security Officer if your oxygen supply or other respiratory-related equipment cannot be safely disconnected. Only you can disconnect yourself to allow for your oxygen canister/system to be x-rayed. Check with your doctor before coming to the checkpoint to make sure that you can disconnect your oxygen safely. If your doctor says that you cannot safely disconnect your oxygen, or if you are concerned, ask the Security Officer to use an alternative process to inspect your oxygen source while you stay connected to it. Security Officers will need to either x-ray or physically inspect your oxygen equipment, and test it for traces of explosives.

Travelers with disabilities, medical conditions, and the mature may want to consider the following:

- Arrive at the airport well in advance, 2-3 hours prior to flight
- □ Follow all published rules on carry-on items and medications
- □ Bring documentation on medications, devices, medical condition where possible. This is not a requirement and will not exempt a passenger from the screening process.
- □ Pack medications in a clear bag separate from other carry-on items/bags
- Ensure medically prescribed medication bottles (name on bottle) match your ticket
- Exercise patience with the lines, delays, and stringent screening procedures

For additional information on traveling with your Eclipse please contact SeQual Technologies Customer Service at **800-826-4610**. It is also recommended you refer to the TSA website for any policy changes before you travel. Guidance and tips to travelers with disabilities are located on the Department of Homeland Security Transportation Security Administration website at: www.tsa.gov.

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U.S. Department of Transportation **Pipeline and Hazardous Materials Safety Administration** 

MAR 1 8 2009

Ms. Pamela J. Jackson Director of Global Product Marketing SeQual Technologies Inc. 11436 Sorrento Valley Road San Diego, CA 92121

Dear Ms. Jackson:

This responds to your January 22, 2008 letter requesting clarification of new requirements under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) as amended in Docket HM-224C and HM-224E, published August 9, 2007 (72 FR 44929). Specifically you ask about the applicability of the revised passenger exceptions in § 175.10(a)(17) to individuals traveling on passenger aircraft with the Eclipse<sup>™</sup> Oxygen System.

According to your letter, the Eclipse<sup>™</sup> Oxygen System is a portable oxygen concentrator - a device that separates oxygen from room air for delivery to patients who require supplemental oxygen therapy. The battery pack for your Eclipse Oxygen System device contains twenty-four (24), 2.2 ampere-hour lithium ion cells. The battery pack consists of two, independent, 12-cell batteries. Both batteries are housed in a single plastic enclosure that are electrically isolated and mechanically separated from the other. The two batteries in the enclosure are not electrically connected together by permanent means. Each battery has 7.90 grams of equivalent lithium content (ELC). The lithium ion battery pack's electrical connectors are designed to allow independent electrical access to each of the two 12-cell batteries in the enclosures. When the battery pack is inserted into the battery compartment of your device, the two separate 12-cell batteries within the pack are electrically connected by circuitry that is part of the internal power management system, but external to and separate from the battery pack.

Your questions are paraphrased and answered as follows:

Q1. Does the exception in § 175.10(a)(17) apply to passengers carrying an Eclipse<sup>™</sup> Oxygen System as described above?

A1. Yes. As described in your letters, the battery pack's electrical connectors are designed to allow independent electrical access to each of the two 12-cell batteries (each containing 7.90 grams ELC) in the enclosures. When the battery pack is inserted into the battery compartment of your device, the two separate 12-cell batteries within the pack are electrically connected by circuitry that is part of the internal power management system, but external to and separate from the battery pack. Therefore, when intended for personal use, the exception in § 175.10(a)(17) would apply.

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Q2. Is there a limit on the number of spare lithium ion batteries as described in your letter that passengers can bring with them in their carry-on baggage?

A2. No. The two-battery limit per passenger in § 175.10(a)(17) only applies to batteries that exceed 8 grams of ELC. There is no limit to how many spare batteries passengers using the Eclipse<sup>™</sup> Oxygen System, as described above, may have in their carry-on luggage.

Q3. May passengers traveling with the Eclipse<sup>™</sup> Oxygen System offer the equipment as checked baggage with the lithium ion batteries installed?

A3. Yes. Passengers should be aware that any batteries for the system must be installed if offered as checked baggage.

I hope this information is helpful. If you have further questions, please do not hesitate to contact this office.

Sincerely,

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