



U.S. Department  
of Transportation

**Pipeline and  
Hazardous Materials Safety  
Administration**

MAY 3 2005

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

Ms. Debbie Huber  
TG Missouri Corporation  
2200 Platting Road  
Perryville, MO 63775

Ref. No. 05-0084

Dear Ms. Huber:

This is in response to your April 8, 2005 letter regarding packaging requirements for air bags under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically you ask if you can design one 4G packaging that is certified under one test report for several air bag models. In your letter you describe scenarios in which your air bags vary in shape, size, and weight.

A packaging may be tested and certified under one test report and used for different air bags provided the following provisions are met:

- (1) The outer packaging and inner packaging, which contains the air bag and its cushioning materials, are identical to the tested design type or can meet one of the variations set forth in § 178.601(g);
- (2) The packaging design type is tested with the heaviest air bag that it will contain; and
- (3) Cushioning material is used to fill any void space created by air bags of smaller dimensions.

I hope this satisfies your request.

Sincerely,

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



050084

§178.601(g)

*Attn: ED MAZULLO*

~~huber debbie~~

**From:** huber debbie  
**Sent:** Friday, April 08, 2005 8:54 AM  
**To:** 'infocntr@dot.gov'; 'inforcntr@rspa.dot.gov'; 'infocntr@dot.gov'  
**Cc:** 'propack@mcleodusa.net'  
**Subject:** FW: Airbag pack for UN certification

*Pollock  
\$178.601 (9)  
Applicability  
05-0084*

ATTENTION: Ed Mazullo  
REFERENCE # 05-0084  
RE: Request for Letter of Interpretation

From:  
Debbie Huber  
TG Missouri  
2200 Platting Road  
Perryville, MO 63775  
314-989-5399

Ed,

Back in August I made a request to ProPack testing lab that test all the expendable air bag module packagings for TG Missouri. The request was to have one box for all inner packs that TG stocks. TG supplies many automotive assembly plants with airbag module assemblies (UN3268). The main packaging for domestic use is high strength re-useable plastic. TG must have a back-up just in case the empty totes are not returned in time for the next shipment. TG also exports one of the driver airbags. TG wishes to use a standard box for all these packs. The inner dunnage can change to insure minimal movement of part plus protect the quality appearance of the parts. Can TG test each pack and for the markings on the box put the highest weight tested for and one +A\_\_\_ number? The test paperwork can show all innerpacks tested and the weight? Seems simple to me but maybe I'm missing something. Please confirm.

Thanks for your assistance.  
Debbie Huber  
Purchasing Manager Logistics / Packaging

-----Original Message-----

**From:** propack [mailto:propack@mcleodusa.net]  
**Sent:** Thursday, April 07, 2005 4:56 PM  
**To:** 'huber debbie'  
**Subject:** FW: Airbag pack for UN certification

Debbie,

Ok, here is the letter that I sent to D.O.T last week. I need you to review it, add to it, modify it or whatever it takes to make sure it covers all of your points, questions and concerns. Then forward to D.O.T at BOTH of the following addresses.

[infocntr@dot.gov](mailto:infocntr@dot.gov)

and

[inforcntr@rspa.dot.gov](mailto:inforcntr@rspa.dot.gov)

Send to the attention of Ed Mazullo. Reference this number: Reference # 05-0084. This is VERY important as they already have a "case" open under my previous e-mail with that number and they need to be able to link the two together. Include your name and address so they can reply to you in writing. You can also fax this letter to 202-366-3012 if you like. Again to the attention of Ed Mazullo. Put "Written Request for Interpretation" in the heading of the letter or e-mail. This should finally get you the answer you need for this question. I would be interested in knowing how it all turns out. Let me know if there is anything else I

4/8/2005

can do. Take care.

Manuel Rosa  
President  
Pro-Pack Testing Laboratory, Inc.

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**From:** propack [mailto:propack@mcleodusa.net]  
**Sent:** Tuesday, March 29, 2005 8:27 AM  
**To:** 'john.gale@rspa.dot.gov'  
**Subject:** FW: Airbag pack for UN certification

John,  
My customer is asking me about this letter from August of last year that I sent to you. She claims that she never received a response. Do you recall responding to this and if so can you forward me the response so I can keep it on file? I appreciate your help.

---

**From:** propack [mailto:propack@mcleodusa.net]  
**Sent:** Friday, August 27, 2004 8:37 AM  
**To:** 'john.gale@rspa.dot.gov'  
**Subject:** Airbag pack for UN certification

John,  
My name is Manuel Rosa. I operate Pro-Pack Testing Laboratory, Inc, a third party certified laboratory. Kevin Boehry gave me your name as someone who could help me with a problem my shipper is having. I have a customer that ships airbags. The UN # is 3268, class is 9, Packing Group III. The outer box (4G box) remains the same for every shipment. The style, shape, size and weight of the airbag can change. There are driver and passenger airbags. The inner dunnage used to hold the airbags in place may also change with regards to size, shape density (foam is used for driver side airbags) and material of construction (passenger airbags use corrugated dunnage and the airbag is wrapped in bubble wrap.) The shipper of these airbags has many different style shapes and weights of airbags in addition to the changes in dunnage mentioned above. All variations (combinations) of airbags / dunnage are not available all at once. They come up with the necessary dunnage as new airbags become available for shipment. I have already tested a number of these airbag / dunnage combinations to date and have treated each one as a new certification which essentially means that I give each package a new +AI \_\_\_\_\_ at the end of the marking. The problem is that over time, the shipper will have many markings to represent each individual combination of airbag / dunnage types and logistically cannot mark each outer shipper with a different +AI designation and keep them separated properly. I have reviewed Variation 1 of section 178.601 and that cannot be used due to the fact that the airbags will change shape, size and weight essentially at random. The airbags may also be oriented within the outer box differently in addition to the dunnage changing size, shape, densities and materials. The goal here is to have ONE outer shipper (4G box) that can ship various airbags of various sizes, shapes and weights using different inner dunnages of different size shapes, weights, densities and materials.. As I stated before, all of these are being tested and certified by Pro-Pack Testing Laboratory, Inc. but the real issue is how to properly mark the box to cover all the proper (and many) variations of airbags and dunnages.

Ideally we would be able to give each new airbag/dunnage combination the same +AI \_\_\_\_\_ code and then attach each subsequent report to the previous one. There is even a problem with this though because if a new pack comes along that weighs more than the heaviest pack already tested, then it should be given a new marking with a heavier weight and a new +AI designation. A second problem with this is also the fact that the recertification dates would be spread out over months or even years.

I would appreciate any feedback you could provide as to how to handle this properly.

Manuel Rosa, Jr.  
President  
Pro-Pack Testing Laboratory, Inc.  
618-277-1160 phone  
618-277-1163 fax  
[m.rosa@propacktestlab.com](mailto:m.rosa@propacktestlab.com)  
[www.propacktestlab.com](http://www.propacktestlab.com)

Pollaek  
 § 178.601  
 Applicability  
 05-0084

**Gale, John <PHMSA>**

**From:** propack [propack@mcleodusa.net]  
**Sent:** Tuesday, March 29, 2005 9:27 AM  
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[www.propacktestlab.com](http://www.propacktestlab.com)

04/07/2005