



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

1200 New Jersey Ave., S.E.
Washington, DC 20590

AUG 30 2011

Mr. Thanh Seybold
Contracts Administrator
Conax Florida Corporation
Cobham Life Support
2801 75th Street
Petersburg, FL 33710

Ref.: No.: 10-0134

Dear Mr. Seybold:

This responds to your letter requesting guidance on re-classifying an “inflator” device packaged and shipped under Competent Authority (CA) Approval Number “EX-9110087”, in accordance with the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). You enclosed drawings of the device. According to your letter, this device is a water-activated automatic life preserver “inflator” which attaches to a life preserver. The “inflator” automatically actuates when immersed in water, assuming the human user is unconscious. These “inflator” devices are packaged with life preservers and are also packaged and shipped separately. Your company’s primary customer is the U.S. military: the Navy, Marines, and Air Force. The device is classed and described as “Cartridges, power device, 1.4S, UN0323, PG II” under CA “EX-9110087.” You ask if this device should be classified as “Hazard Class 9, Life-saving appliances, UN3072.”

The answer is no. The description “Life-saving appliances, not self-inflating containing dangerous goods as equipment (UN3072)” applies to the overall appliance rather than individual hazardous material used to supplement the appliance, such as those listed in § 173.219(b). The exception is intended to provide relief for a small quantity of a hazardous material that is integrated into a life-saving appliance. The “inflator” itself, classed and described as “Cartridges, power device, 1.4S, UN0323, PG II” under CA “EX-9110087,” may not be reclassified and described as “Life-saving appliances, not self-inflating containing dangerous goods as equipment (UN3072).” The inflator must be integrated into a life-saving appliance.

I hope this information is helpful. If we can be of further assistance, please contact us.

Sincerely,

Ben Supko
Acting Chief, Standards Development
Standards and Rulemaking Division

Cobham Life Support
2801 75th Street North
St. Petersburg, FL 33710 USA
T: +1 (727) 345 8000
F: +1 (727) 345 4217

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Approvals Branch
Office of Hazardous Materials Transportation
Department of Transportation
400 Seventh Street SW,
Washington, DC 20590-0001
Attn: PHH-32, Room 8102

Engram
§173.219
Life-saving Appliances
10-0134

Subject: Guidance Regarding Reclassification of P/N 1812-173-01

Dear Sir/Madam,

Conax Florida Corporation is requesting guidance regarding the reclassification of our Part Number 1812-173-01 under § 173.219 of 49CFR. This is an "inflator".

This device is water-activated automatic life preserver "inflator" which attaches to a life preserver. They automatically actuate when immersed in water when the human user is unconscious, the life preserver shelf inflates. These devices are packaged with life preservers; however, we also ship them separately. Our main customer is the U.S. military: US Navy, Marines, and Air Force.

The item was previously classified as Cartridges, Power Device, UN0323, 1.4S, EX-9110087. However, we feel this may be a misclassification.

As opposed to the UN0323 classification in 49CFR § 173.219 (b)(6), it describes "For self-inflating life saving appliances only, cartridge power device of Division 1.4S, for purposes of the self-inflating mechanism provide that the quantity of explosives per appliance does not exceed 3.2g". We feel our device fits this definition; therefore, whenever they are not directly connected to the life preserver, are we able to ship this item and others similar to them as a Hazard Class 9, Life-Saving Appliance, UN3072? Our military customers would prefer this.

This new class under 173.219 (b)(6) allows air transport without a Competent Authority an aid to normal packing. This is due to the extremely small explosive, self-contained gas cartridge and associated with life preserves generally.

Enclosed are the drawings of these parts listed below:

Part Number	1812-173-01
Sub-assembly	1612-051-02
Sub-assembly	1612-011-02

Cylinder CC-501-01
Primer CC-114-01, 65mg base charge, 205mg ignition charge

At this time, we would appreciate your efforts to review the enclosed reports and drawings and defining the intent of the regulations for classifying Life-Saving Appliances and our device/cartridge under that category.

Thank you,

Thanh Seybold

Contracts Administrator
Conax Florida Corporation
727-346-2709
thanh.seybold@cobham.com