



U.S. Department  
of Transportation

**Pipeline and  
Hazardous Materials Safety  
Administration**

MAR 20 2007

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

Mr. Thomas Schneider  
President  
Packaging Technology Center  
P.O. Box 15274  
Houston, Texas 77220

Ref. No.: 06-0263

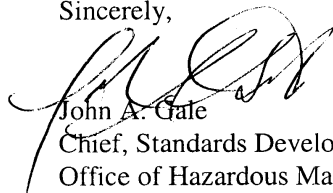
Dear Mr. Schneider:

This is in response to your November 15, 2006 letter requesting clarification of the requirements in the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to packagings for air bag modules. Specifically, you ask if shrink wrapping 11 fiberboard boxes of air bag modules to a pallet constitutes a single packaging under the HMR. According to your letter, each box measures 96" L x 41" W x 4" and the palletized unit measures 96" L x 41" W x 48". Also, you indicate that a representative of the Department suggested that if a shroud were placed over the palletized unit, it may meet the criteria for a 50G design.

Authorized packagings for air bag modules are provided in § 173.166(e). The palletized configuration described in your letter is not an acceptable packaging for air bag modules. A 4G box that meets the general packaging requirements in Part 173 and the performance oriented packaging requirements in Part 178 at the Packing Group III performance level is an authorized packaging. To utilize the packaging configuration described in your letter, the individual boxes must be authorized 4G packagings and the shrink wrapped pallet must be treated as an overpack in accordance with § 173.25. A 50G packaging is not an authorized packaging for air bag modules.

I hope this information is helpful. Please contact us if you require additional assistance.

Sincerely,



John A. Gale  
Chief, Standards Development  
Office of Hazardous Materials Standards



060263

173.166(e)



Supko  
§173.166  
Air Bag Module  
06-0263

November 15, 2006

US Department of Transportation  
Office of Hazardous Materials Standards (PHH10)  
400 7<sup>th</sup> Street SW  
Washington, DC 20590

Re: Special Approval Request for Air Bag Module (UN3268) Packaging

We have a client that manufactures air bag modules, UN3268. The nominal dimensions of the full package are 96" L x 41" W x 48" H, including the wooden pallet. The complete package is then stretch wrapped and strapped with plastic strapping. I have attached two photos of their packaging to this letter.

Each individual box, or layer, is 96" L x 41" W x 4" H and contains 7 air bag modules each. The individual layers might possibly be certified but the client chooses not to tape each "layer" closed as an individual package because they go to a production line in the bulk, palletized form. This is a matter of labor and material cost. So, our aim is to certify the complete, 48" high package, with 11 layers of boxes, as one unit.

After some discussion with Don Burger at DOT, it is his opinion that this package may be considered a 50G design. It was suggested by him that a shroud be placed over the entire package. While my client may be willing to do so if required, they would prefer not to use a shroud as a matter of packaging materials source reduction and cost.

Please advise the proper test procedure, as soon as possible as this is a large project with a lot of certifications that need to be done quickly. Also, please advise the proper UN mark and location of that mark.

Sincerely,

A handwritten signature in black ink that reads "Thomas L. Schneider". The signature is fluid and cursive, with the first name being the most prominent.

Thomas L Schneider, CPP  
President

Attachment: 2 photographs on 2 pages

Page 1