



U.S. Department  
of Transportation

**Research and  
Special Programs  
Administration**

JUN 13 2000

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

Mr. Paul B. Medwig and  
Mr. Scott Bischoff  
Professional Services Industries  
850 Poplar Street  
Pittsburgh, PA 15220

Ref. No. 00-0095

Dear Messrs. Medwig and Bischoff:

This is in response to your letter dated March 23, 2000, and subsequent telephone conversation with Eric Nelson of my staff regarding non-bulk package testing under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask whether an oxygen generator may be replaced by a "mock-up" oxygen generator for package testing when there would be no way of determining whether the oxygen generator fired during the test.

Section 178.602(a) requires each package be closed in preparation for testing and tests be carried out in the same manner as if the package was prepared for transportation. A hazardous material may be replaced by a non-hazardous material for package testing provided its physical properties correspond as closely as possible to the hazardous material to be transported (See § 178.602(c)). Special Provision 60 requires that each oxygen generator that is shipped with its means of initiation attached incorporate at least two positive means of preventing unintentional actuation and be classed and approved by the Associate Administrator for Hazardous Materials Safety.

In the case of oxygen generators, the requirements of § 178.602 apply to the structural integrity of the packaging, not whether the generator fires. The terms of an approval will authorize the means of preventing unintentional actuation. Additional packaging performance requirements may be specified in an approval, especially if transportation by aircraft is authorized.

If this office can be of any further assistance, please contact us.

Sincerely,

Delmer F. Billings  
Chief, Standards Development  
Office of Hazardous Materials Standards



000095

172.101(0)

Nelson  
S172.101(0)  
Oxygen generator  
March 23, 2000 Chem  
00-0095

Edward T. Mazzullo  
Director Office of Hazardous Material Standards  
U.S. DOT RSPA (DHM-10)  
400 7<sup>th</sup> Street Southwest  
Washington, DC 20590-0001

Dear Mr. Mazzullo:

We were informed per our telephone conversation with the DOT Hotline that it is acceptable to test boxes intended for the purpose of shipping oxygen generators with mock-ups (dummies) rather than the actual generator. There is some concern with the legitimacy of this test since there could be no way of knowing if the generators fired using mock-ups.

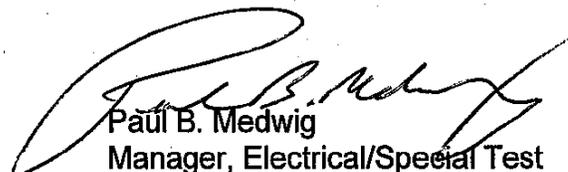
The seriousness of this test dictates that we request a written response concerning this issue before we feel we can proceed with this testing. Thank you for your timely cooperation in this matter.

If you should have any questions concerning this request, please feel free to contact us at (412) 922-4000.

Sincerely,  
**Professional Service Industries, Inc.**



R. Scott Bischoff  
Lab Technician, Special Test



Paul B. Medwig  
Manager, Electrical/Special Test