



U.S. Department  
of Transportation

**Research and  
Special Programs  
Administration**

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

NOV - 7 2000

Mr. Matt Hatfield  
Hazardous Materials Analyst  
TRW Automotive  
Occupant Safety Systems  
11202 East Germann Road  
Queen Creek, AZ 85242-9361

Reference No.: 00-0272

Dear Mr. Hatfield:

This is in response to your September 20, 2000 letter requesting a clarification on whether a packaging used for Class 9 air bag inflators and modules, packaged under § 173.166(e)(3) of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180), would be considered a single or a combination packaging.

You describe the packaging as an inner fiberboard locator tray positioned in the bottom of an outer fiberboard box. The air bags are positioned securely in the locator tray and covered with a fiberboard divider which encloses the top and two sides. A second fiberboard locator tray is placed on the top of the first divider along with more air bags and a second divider. You state that this configuration was tested and certified as a 4G single packaging. However, you believe the configuration is a combination package.

Your packaging configuration is a combination packaging. A 4G packaging may be used as a single or a combination packaging, depending upon the packaging provision authorization. A combination packaging is one that consists of an outer non-bulk packaging (e.g., a fiberboard box) and a separate inner packaging that is a "containment vessel." See definitions in §171.8. Section 173.166(e) authorizes the use of an outer 4G packaging meeting the Packing Group III performance level for the prescribed inner packagings, i.e. the airbag devices. The inner packagings (devices) must be secured within the 4G packaging to prevent movement during transportation.

I hope this satisfies your request.

Sincerely,

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

Occupant Safety Systems  
11202 E. Germann Road  
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Tel 480.722.4000

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173.166(e)(3)  
Packaging  
00-0002  
TRW

September 20, 2000

Research and Special Programs Administration  
Office of Hazardous Materials Safety (DHM-10)  
U.S. Department of Transportation  
400 Seventh Street, SW.  
Washington DC, 20590-0001

RE: Request for Written Interpretation

Dear Mr. Mazzullo:

Thank you in advance for taking the time to review this letter. I am requesting clarification on whether our package meets the definition of a single or combination package. We manufacture and ship air bags inflators / modules, pyrotechnic, class 9, UN3268 which we package per 49 CFR 173.166 (e) (3) specifically the 4G. 49 CFR 178.502(c) states that for combination packages, only the code number for the outer packing is used, so when the regulations specify a 4G box I believe this may be a single or combination package. Our package consists of the following:

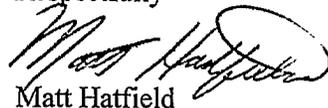
**Inner packaging:** A fiberboard locator tray is positioned in the bottom of an outer fiberboard box, air bags are then positioned securely in the nests of the locator trays. Next a fiberboard divider is placed over the top of the articles. The divider is used to enclose the top and two sides of the article. A second fiberboard locator tray is then placed on top of the first divider along with more articles and a second divider.

**Outer Packaging:** The outer packaging consists of a fiber board box that is securely closed and further prepared for transportation.

This configuration has been tested and certified as a 4G single packaging, however, we believe that our inner packaging design constitutes an inner receptacle per 171.8, which defines an inner receptacle as one which requires an outer packaging in order to perform its containment function. The inner receptacle may be an inner packaging of a combination packaging or the inner receptacle of a composite packaging. Also several packaging instructions in 49 CFR 173.62 clearly state that fiberboard receptacles or even sheets of paper are acceptable as inner packagings. For these reasons we believe that our inner packaging as described above meets the definition of an inner packaging thus making our package a combination package.

If more information is required, please contact me at the phone number or e-mail address below. Any clarification you could provide would be greatly appreciated.

Respectfully

  
Matt Hatfield

Hazardous Materials Analyst

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E-mail: matt.hatfield@trw.com





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**CERTIFIED MAIL**



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