



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue SE
Washington, DC 20590

AUG 19 2015

Jeff Christafore
Dangerous Goods Compliance Specialist
Bombardier (Aerospace)
2400 Aviation Way
Bridgeport, WV 26330

Ref. No. 15-0041

Dear Mr. Christafore:

This responds to your March 3, 2015 e-mail requesting clarification on the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to life-saving appliances. In your e-mail, you describe a small cylinder carrying "UN1072, Oxygen, compressed," a Division 2.2 compressed gas, which you have suggested could be incorporated in an "oxygen box assembly" for purposes of use on a passenger aircraft, and subsequently re-classified as "UN3072, Life-saving appliances, not self-inflating," a Class 9 hazardous material. You have also provided a schematic diagram of the assembly. Your questions are paraphrased and answered as follows.

Q1. Can compressed oxygen contained in a cylinder manufactured according to DOT-SP 14399 and incorporated in the above described assembly be re-classified as "UN3072, Life-saving appliances, not self-inflating"?

A1. Under § 173.22, it is the shipper's responsibility to classify a hazardous material. This Office does not normally perform this function. However, based on the information provided, it is the opinion of this Office that the assembly could be re-classified as "UN3072, Life-saving appliances, not self-inflating" provided that the assembly as configured during transportation is intended to perform a life-saving function.

Q2. You state that the cylinder, which would form part of the life-saving appliance, is manufactured according to a special permit (i.e., DOT-SP 14399). Is the shipper required to identify the special permit on the outer package and prepare copies of the special permit for the carrier?

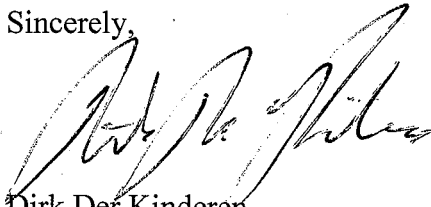
A2. Yes. Section 172.301(c) requires the outside of each package authorized by a special permit to be durably marked "DOT-SP" followed by the special permit number assigned. The special permit in question does not waive this requirement. In addition, under § 173.22a(c), "...the offeror shall furnish a copy of the current exemption or special permit to the carrier before or at the time a shipment is tendered." Further, in DOT-SP 14399, paragraph 10, modal requirements, states, "A current copy of this special permit must be carried aboard each cargo vessel, aircraft or motor vehicle used to transport packages

covered by this special permit. The shipper must furnish a copy of this special permit to the air carrier before or at the time the shipment is tendered."

Compressed oxygen contained in a cylinder manufactured according to DOT-SP 14399 would need to comply with the provisions under § 173.302(f)(3), (4), and (5) (Thermal Resistance Test, Flame Penetration Test, and marking requirements) when transported by aircraft. If a DOT-SP 14399 cylinder containing compressed oxygen is re-classed as "UN3072, Life-saving appliances, not self-inflating," it would still be required to comply with § 173.302(f)(3), (4), and (5) as the requirements in § 173.219(b)(1) provide that "Division 2.2 compressed or liquefied gases must be packed in cylinders in accordance with the requirements of this subchapter [C]".

I hope this answers your inquiry. If you need additional assistance, please contact this Office again.

Sincerely,

A handwritten signature in black ink, appearing to read "Dirk Der Kinderen", written over a horizontal line.

Dirk Der Kinderen
Acting Chief, Standards Development Branch
Standards and Rulemaking Division

Lesko
§173.219
Life saving appliances
15-0041

Dodd, Alice (PHMSA)

From: Ciccarone, Michael CTR (PHMSA)
Sent: Tuesday, March 03, 2015 4:07 PM
To: Hazmat Interps
Subject: FW: Letter of Interpretation Requested
Attachments: 20141216_150627.jpg; 20141216_150534.jpg; 20141216_150613.jpg; DOC.PDF

Shante/Alice,

Please submit this for a formal letter of interpretation. Mr. Christafore spoke with Shelby in the HMIC.

Thanks,

Mike

From: Jeff Christafore [<mailto:jeff.christafore@aero.bombardier.com>]
Sent: Tuesday, March 03, 2015 11:59 AM
To: PHMSA HM InfoCenter
Subject: Letter of Interpretation Requested

Good afternoon,

I am in need of some assistance with the possible reclassification of a part. I know that your office does not provide classifications, but I was hoping that some guidance could be provided.

I have reviewed some other interpretations, but DOT Interpretation Ref No. 00-0028 provided for Essex PB&R Corporation seems to be the most relevant.

We are currently required to ship small Oxygen, compressed cylinders to customers worldwide.

- The dimensions of the bottle are 9.2" L x 2.75" D
 - They are used on aircraft to supply emergency oxygen to passengers in the lavatory and are being used to replace oxygen generators that were previously installed.
 - These cylinders are manufactured under DOT-SP 14399, which is basically a DOT-39 cylinder with some exceptions.
 - When this cylinder is sent separately it is classified as UN1072 Oxygen, compressed.
1. I need to determine, if the same cylinder is attached to a panel, can be reclassified as UN3072 Life-saving appliances, not self-inflating. *(Pictures attached)*
 2. Also, if acceptable to reclassify as UN3072, since the cylinder is manufactured under a special permit, is there still a need to identify the DOT-SP 14399 on the outer package and paperwork as required by the regulations? *(UN3072 is not currently an allowable proper shipping name under the terms of the special permit)* Per my understanding there are other life-saving appliances with attached special permit cylinders that are not required to have the special permit identified.

49CFR 173.219 for Life-saving appliances, allows them to contain 2.2 compressed gases packaged in cylinders that are an integral part of the appliance and the only reference to size is that the quantities don't exceed those appropriate for the actual appliance when in use.

In addition to the pictures referenced above, I have also attached details and drawings for the part.

I would greatly appreciate any assistance you can provide.

Thank you and have a great day!

Jeff Christafore

Dangerous Goods Compliance Specialist

Aerospace

jeff.christafore@aero.bombardier.com

*2400 Aviation Way
Bridgeport, WV 26330*

Office: 304-848-5202

Mobile: 304-975-4229

BOMBARDIER
the evolution of mobility

CONFIDENTIALITY NOTICE - This communication may contain privileged or confidential information. If you are not the intended recipient or received this communication by error, please notify the sender and delete the message without copying, forwarding and/or disclosing it.

BOMBARDIER

Authorized Parts list

C+D S/B: 3868303-25-A-02

Kit number	601R35-020K350	Production order num	7066213
Kit Description	KIT, OXYGEN DISPENSING ASSEMBLY	Date	2015/01/14
Expiry			
CID Number for Kit	890101608500		
Revision	SB 601r-35-020 REV NC	Model	REGIONAL JET 200

Part number	Description	Cage Code	Kit Qty	Issued Qty	Alt Item	Expiry	Serial Number	CID Number
601R35-020K350	KIT, LAVATORY SB	56135	1	1				890101602581



SERVICE BULLETIN

H. ELECTRICAL LOAD DATA

Not affected.

I. REFERENCES

The following documents were used as data sources in preparation of this Service Bulletin:

References
Table 1

Document №	Title
CDK386-30	Lavatory - SB Kit
115082-01	Oxygen Box Assembly
115R82-02	Oxygen Box Assembly
3868303-101	Oxygen Box Assembly
9326246	Mask Packing Instruction
(AD) 2012-11-09	FAA Airworthiness Directive
CDR3868-8-I	Qualification Test Plan
CDR3868-8-II	Qualification Test Results
CDR458.2-2	Fire Properties Similarity Report
CF-2011-03R2	TC Airworthiness Directive

J. PUBLICATIONS AFFECTED

Component Maintenance Manual (CMM) 53-10-03.

2. MATERIAL INFORMATIONA. MATERIAL - PRICE AND AVAILABILITY

Refer to Bombardier Aerospace Service Bulletin for terms and conditions.

B. MATERIAL NECESSARY FOR EACH SPARE

The parts required to modify one oxygen box assembly are included in Kit:

CDK386-30 Lavatory - SB Kit
Table 2

New PN	Description	Qty	Disposition
CDPL604-1-3868303-25-A-02	SB Incorporation Placard	01	Install New
3868303C101	Oxygen Box Assembly	01	Install New

BOMBARDIER

Authorized Parts list

Kit number	601R35-020K1	Production order num	7065172
Kit Description	KIT, OXYGEN DISPENSING ASSEMBLY	Date	2015/01/12
Expiry			
CID Number for Kit	890101606788		
Revision	SB 601r35-020 REV NC	Model	REGIONAL JET 200

Part number	Description	Cage Code	Kit Qty	Issued Qty	Alt Item	Expiry	Serial Number	CID Number
2668303C101	BOX ASSY, OXYGEN	56135	1	1				890101605345
MS35206-230	SCREW, PAN HD	80205	5	5				890101319180
NAS620-6	WASHER, FLAT, REDUCED OD	80205	5	5				890101564955

SERVICE BULLETIN 601R-35-020

3. MATERIAL INFORMATION

A. Kit Information

For Aircraft 7003 thru 7067, 7069 thru 7074, 7076 thru 7098, 7100 thru 7135, 7137 thru 7139, 7141 thru 7151, 7153 thru 7175, 7177 thru 7350, 7352 thru 7390

Kit Contents:

KIT 601R35-020K350 ¹				
PART NUMBER	QTY	NAME	ALTERNATIVE	NOTES
CDK386-30	1	Oxygen Box Assembly Retrofit Kit	—	—
¹ For a list of the kit contents, refer to C&D Zodiac Service Bulletin 3868303-25-A-02.				

For Aircraft 7391 thru 7635, 7637 thru 7672, 7684, 7690, 7697, and 7704

Kit Contents:

KIT 601R35-020K1				
PART NUMBER	QTY	NAME	ALTERNATIVE	NOTES
3868303C101	1	Oxygen Box Assembly	—	—
MS35206-230	5	Screw	—	—
NAS620-6	5	Washer	—	—

B. Consumable Information

For a list of consumables, refer to the C&D Zodiac service bulletin and to the different tasks that are given as references in this service bulletin.

C. Special Tools and Equipment

There are no special tools and equipment for this service bulletin.

D. Disposition of Parts

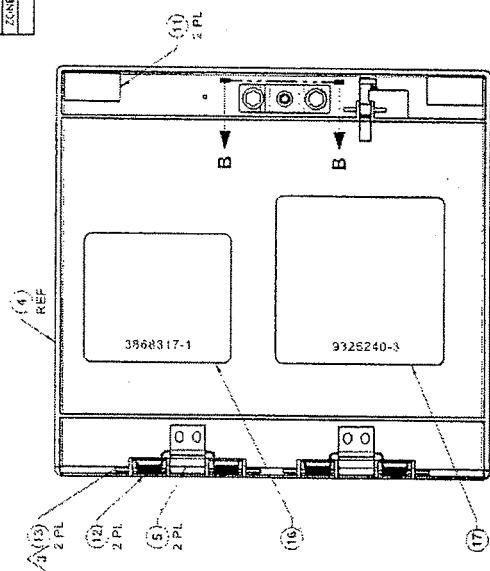
The table that follows shows the disposition of parts on the aircraft (or spares), and the relationship between these parts to the new parts to be installed during the incorporation of this service bulletin.

3868303-101	1	A
-------------	---	---

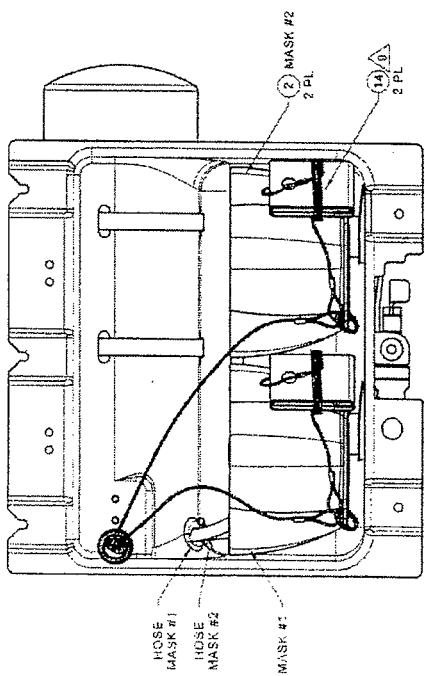
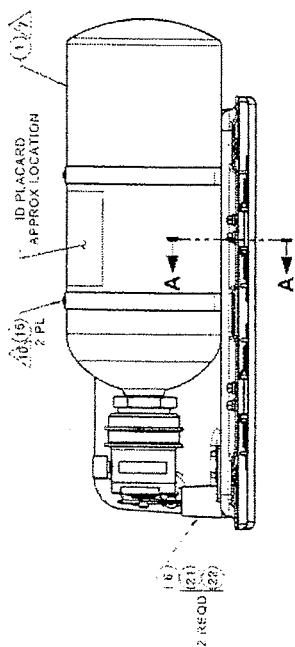
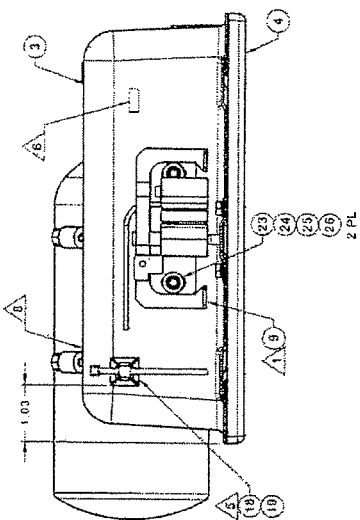
REVISIONS

TABLE 1

REPLACEMENT PINS FOR 3862301-1088302 ASSEMBLIES	
OLD PIN	NEW PIN
3862301-101	3868303-101
3868301-103	
3868302-101	

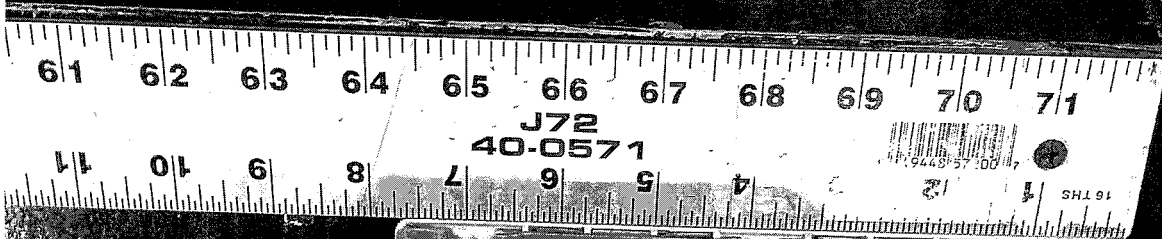


DOOR ASSEMBLY



VIEW SHOWN WITHOUT DOOR

[illegible]

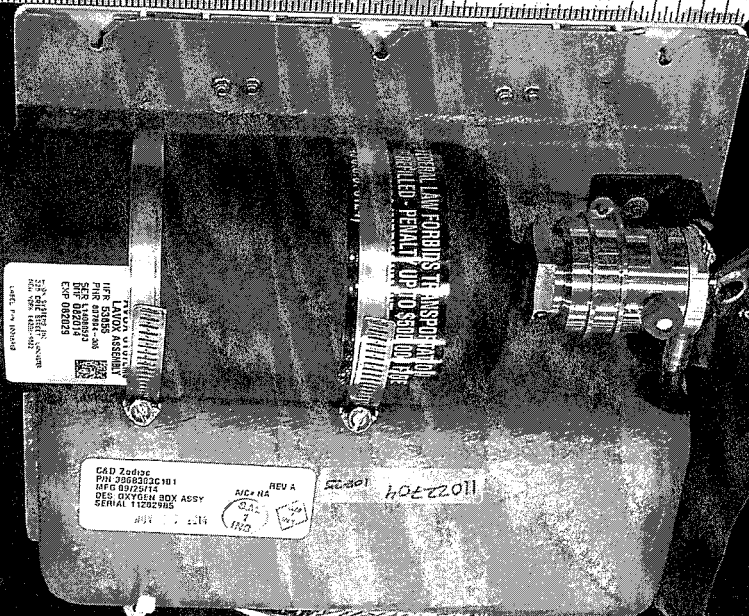
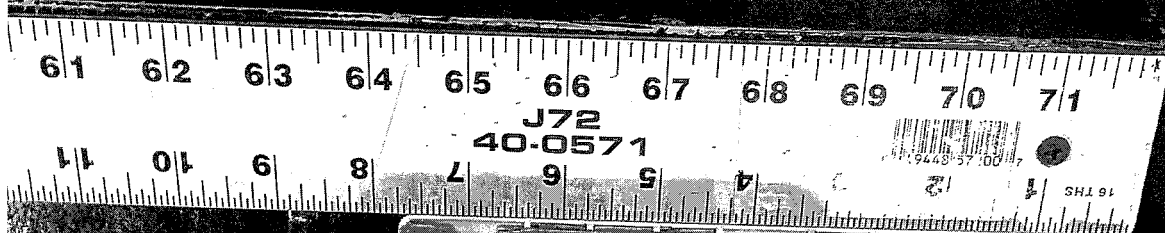


AFTER INSERTING
RELEASE PIN
REMOVE TO ARM
OXYGEN SUPPLY



11022704
10P25
REV A
FIG. 1
FIG. 2
FIG. 3
FIG. 4
FIG. 5
FIG. 6
FIG. 7
FIG. 8
FIG. 9
FIG. 10
FIG. 11
FIG. 12
FIG. 13
FIG. 14
FIG. 15
FIG. 16
FIG. 17
FIG. 18
FIG. 19
FIG. 20
FIG. 21
FIG. 22
FIG. 23
FIG. 24
FIG. 25
FIG. 26
FIG. 27
FIG. 28
FIG. 29
FIG. 30
FIG. 31
FIG. 32
FIG. 33
FIG. 34
FIG. 35
FIG. 36
FIG. 37
FIG. 38
FIG. 39
FIG. 40
FIG. 41
FIG. 42
FIG. 43
FIG. 44
FIG. 45
FIG. 46
FIG. 47
FIG. 48
FIG. 49
FIG. 50
FIG. 51
FIG. 52
FIG. 53
FIG. 54
FIG. 55
FIG. 56
FIG. 57
FIG. 58
FIG. 59
FIG. 60
FIG. 61
FIG. 62
FIG. 63
FIG. 64
FIG. 65
FIG. 66
FIG. 67
FIG. 68
FIG. 69
FIG. 70
FIG. 71
FIG. 72
FIG. 73
FIG. 74
FIG. 75
FIG. 76
FIG. 77
FIG. 78
FIG. 79
FIG. 80
FIG. 81
FIG. 82
FIG. 83
FIG. 84
FIG. 85
FIG. 86
FIG. 87
FIG. 88
FIG. 89
FIG. 90
FIG. 91
FIG. 92
FIG. 93
FIG. 94
FIG. 95
FIG. 96
FIG. 97
FIG. 98
FIG. 99
FIG. 100

CAVOX ASSEMBLY
FIG. 1
FIG. 2
FIG. 3
FIG. 4
FIG. 5
FIG. 6
FIG. 7
FIG. 8
FIG. 9
FIG. 10
FIG. 11
FIG. 12
FIG. 13
FIG. 14
FIG. 15
FIG. 16
FIG. 17
FIG. 18
FIG. 19
FIG. 20
FIG. 21
FIG. 22
FIG. 23
FIG. 24
FIG. 25
FIG. 26
FIG. 27
FIG. 28
FIG. 29
FIG. 30
FIG. 31
FIG. 32
FIG. 33
FIG. 34
FIG. 35
FIG. 36
FIG. 37
FIG. 38
FIG. 39
FIG. 40
FIG. 41
FIG. 42
FIG. 43
FIG. 44
FIG. 45
FIG. 46
FIG. 47
FIG. 48
FIG. 49
FIG. 50
FIG. 51
FIG. 52
FIG. 53
FIG. 54
FIG. 55
FIG. 56
FIG. 57
FIG. 58
FIG. 59
FIG. 60
FIG. 61
FIG. 62
FIG. 63
FIG. 64
FIG. 65
FIG. 66
FIG. 67
FIG. 68
FIG. 69
FIG. 70
FIG. 71
FIG. 72
FIG. 73
FIG. 74
FIG. 75
FIG. 76
FIG. 77
FIG. 78
FIG. 79
FIG. 80
FIG. 81
FIG. 82
FIG. 83
FIG. 84
FIG. 85
FIG. 86
FIG. 87
FIG. 88
FIG. 89
FIG. 90
FIG. 91
FIG. 92
FIG. 93
FIG. 94
FIG. 95
FIG. 96
FIG. 97
FIG. 98
FIG. 99
FIG. 100



LAVOX ASSMNT
J72 40-0571
PIN 266823C101
SERIAL 11022011

C4D Zedoc
PIN 266823C101
SERIAL 11022011
DES. OXYGEN BOY ASSY

REV A
11022011

11022011

ARTIN
ASEPIN
OVETO AR
IGEN SUPP