



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

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

JUN 25 2008

Stephen W. Miller
L-3 Vertex Aerospace LLC
555 Industrial Drive South
Madison, MS 39110

Ref. No. 08-0146

Dear Mr. Miller:

This responds to your May 19, 2008 letter requesting clarification of the proper shipping name for aircraft fuel nozzles under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if nozzles that are removed and sent back to the manufacturer for servicing should be shipped as "Dangerous Goods in Apparatus" or non-hazardous. Your letter indicates that all fuel residue is removed from the nozzles using pressurized air.

Generally, items classified as "Dangerous Goods in Apparatus" (e.g., fuel pumps and injectors, engines, parts, etc.) contain the residue of a hazardous material. If the aircraft fuel nozzles you describe have been completely drained, sufficiently cleaned of residue, and purged of vapors to remove any potential hazard then they are no longer considered hazardous materials. As such, they are not subject to the HMR and may be shipped as non-hazardous (§ 173.22). You should note, however, as the shipper it is your responsibility to properly class the nozzles for transportation; this office cannot make that determination for you.

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

Sincerely,

Susan Gorsky,
Acting Chief, Standards Development
Office of Hazardous Materials Standards

Supko
8173.222

Drakeford, Carolyn <PHMSA>

From: INFOCNTR <PHMSA>
Sent: Monday, May 19, 2008 2:01 PM
To: Drakeford, Carolyn <PHMSA>
Cc: Nickels, Matthew <PHMSA>
Subject: FW: Information Center Comments/Questions

Dangerous Goods in
Machine or Apparatus
08-0146

Carolyn,
Here is the initial interp request. I never sent it my apologies. It wasn't very
apparent he wanted an actual written letter.
Thanks rob

-----Original Message-----

From: Stephen.Miller@L-3com.com [mailto:Stephen.Miller@L-3com.com]
Sent: Thursday, May 15, 2008 3:51 PM
To: INFOCNTR <PHMSA>
Subject: Information Center Comments/Questions

Below is the result of your feedback form. It was submitted by Stephen W. Miller
(Stephen.Miller@L-3com.com) on Thursday, May 15, 2008 at 15:50:48.

Email: Stephen.Miller@L-3com.com

Name: Stephen W. Miller

Category: Interpretations (Letters) issued by PHMSA

Organization: L-3 Vertex Aerospace LLC

Street: 555 Industrial Drive South

City: Madison

State: Mississippi

Zip Code: 39110

Phone: 601-607-6480

Fax: 601-607-6276

Comments: We have aircraft fuel nozzle kits that have to be shipped by air. They contain
fuel nozzles (14 in total). The nozzle have fuel that flows into them and then is sprayed
into the combustion chamber of the engine. When the engine is shutdown air pressure is
sent back through the nozzles removing all fuel residue. The nozzles are removed at a
required time change and sent back to the manufacturer for servicing and then returned to
the field to be placed into another engine. Would these fuel nozzle kit be considered
class 9 Dangerous Goods in Apparatus or as a non-hazardous item when shipped by air?

Drakeford, Carolyn <PHMSA>

From: INFOCNTR <PHMSA>
Sent: Monday, May 19, 2008 9:44 AM
To: Drakeford, Carolyn <PHMSA>
Cc: 'Stephen.Miller@l-3com.com'
Subject: FW: Interpretation letter
Importance: High
Attachments: PHMSA INT.ppt

Carolyn,
This is some additional information for a letter of interpretation I forwarded to you last week. See below.
Thanks,
Rob

From: Stephen.Miller@l-3com.com [mailto:]
Sent: Monday, May 19, 2008 9:32 AM
To: INFOCNTR <PHMSA>
Subject: Interpretation letter
Importance: High

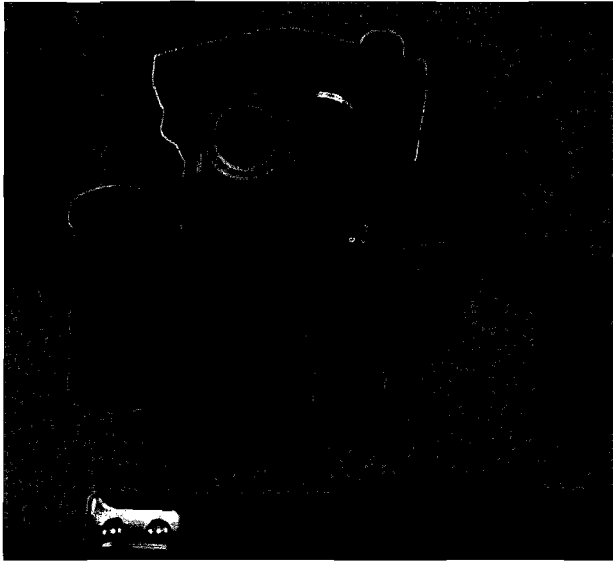
I sent a request for an interpretation on the 15th of May and I am sending the following file to give a better explanation of the question I am asking.

Is it possible that this nozzle kit could be classified as a Dangerous Goods in Excepted Quantities if it is considered to be hazardous when shipping by air?

Stephen W. Miller
T6A Training Administrator
L-3 Vertex LLC
Stephen.Miller@L-3com.com
601-607-6480
601-607-6276 (fax)

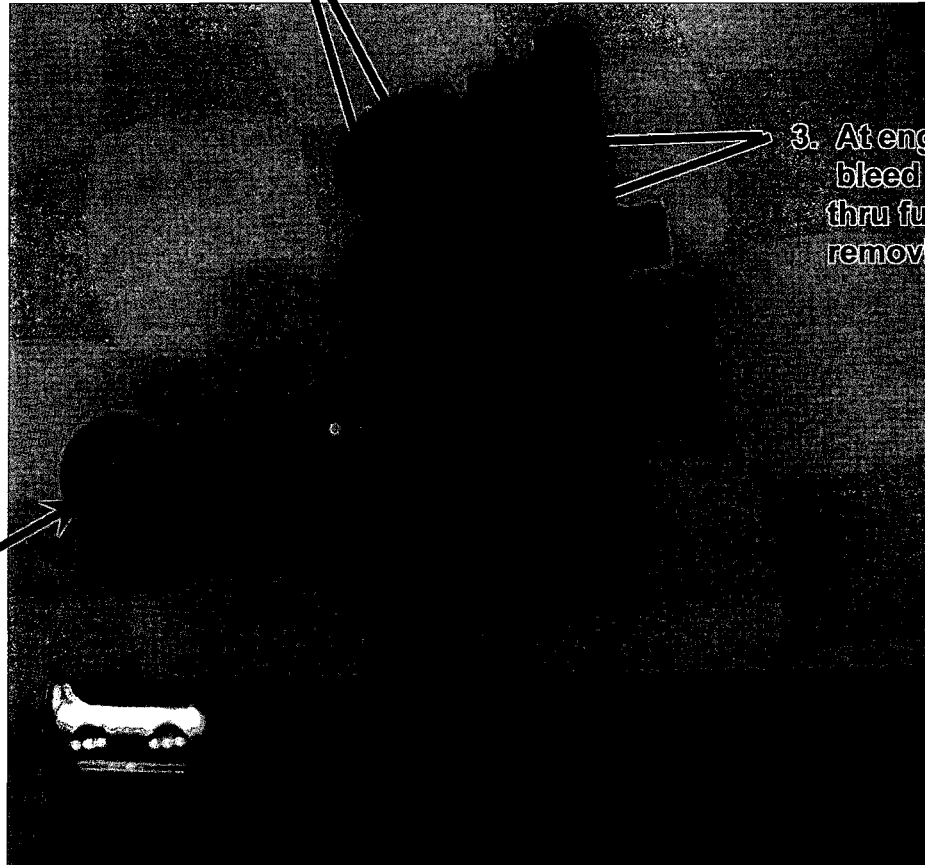
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This shows the actual size of the nozzle

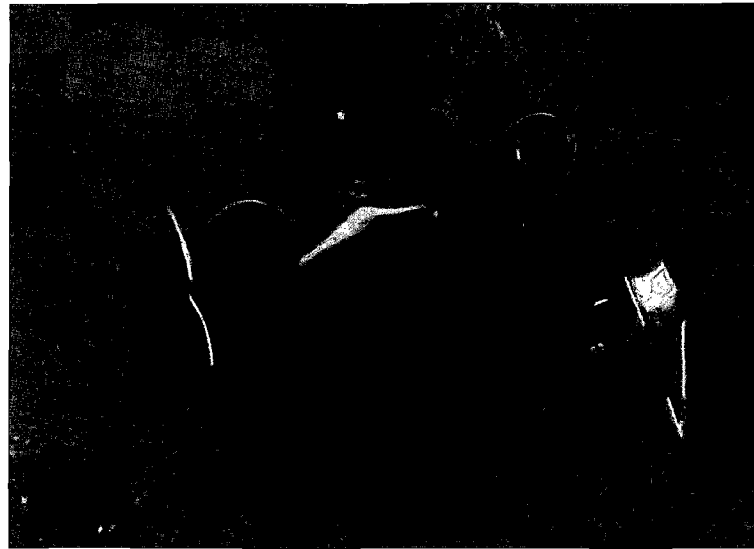
1. Fuel flows thru here during operation



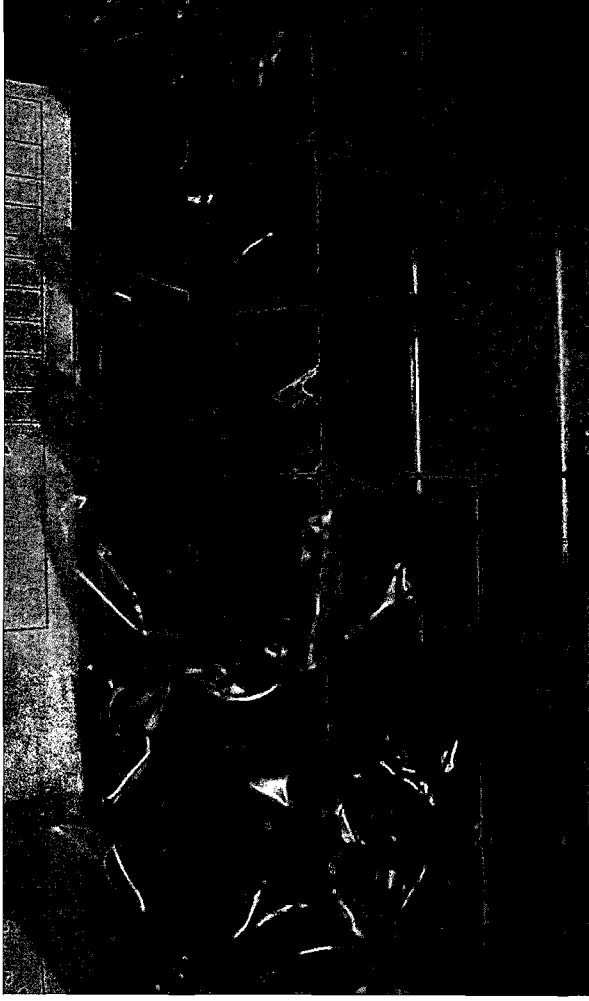
3. At engine shutdown bleed air is sent back thru fuel nozzles removing all fuel

2. Fuel sprayed into combustion chamber thru this nozzle point

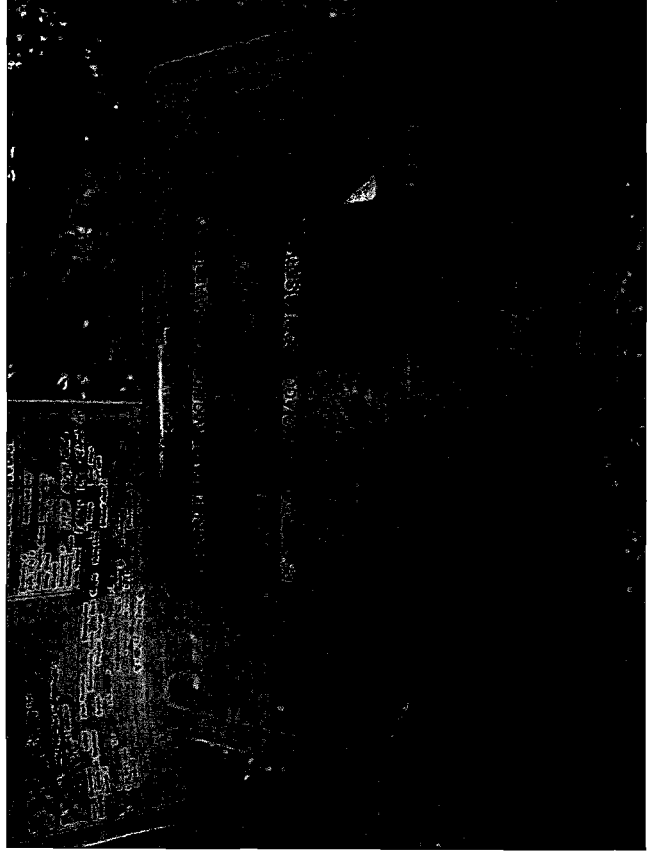
PACKING OF THE NOZZLE KIT



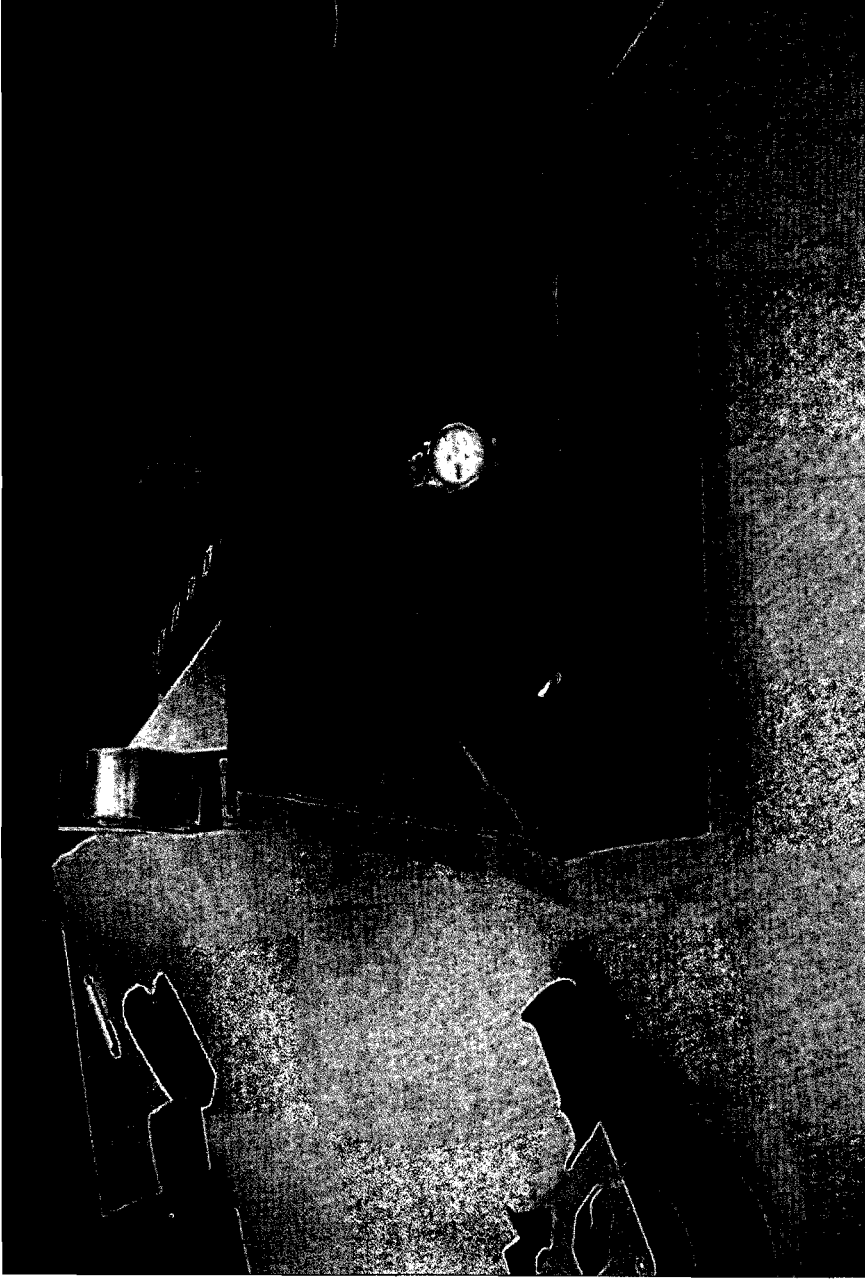
1. Each nozzle is placed inside of leak proof liner



2. All of the nozzles are then placed inside of the plastic box they were received in from the manufacturer.



3. The plastic box is then wrapped with cushioning material placed in fibreboard box they were received in from the manufacturer.



4. The box is then closed and all seams are sealed hazmat shipping tape.