



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives

Washington, DC 20226
www.atf.gov

902030:TEM
10-0156
555.32
5400

APR 14 2010

Mr. Tim Davids
Company Ordnance Administrator
The Boeing Company
P.O. Box 3707
Seattle, Washington 98124-2207

Dear Mr. Davids:

This is in response to your letter dated February 17, 2010, to the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF). You requested an exemption from the Federal explosives regulations for the Conax Eager-Pak Valve in accordance with 27 CFR 555.32, Special Explosive Devices. You included photographs, material safety data sheets, and device specification documents for our review.

According to your letter, the Conax Eager-Pak Valve (also known as Part Number 1512-129-01) is an explosives-actuated gas energy release valve used on small, commercial aircraft, such as Piper Cubs and Cessnas. The Conax Eager-Pak Valve is used on two aircraft safety devices: the aircraft's emergency flotation device (initiated in the event of an emergency landing on water), and the emergency fuel tank pressurization device (initiated in the event of a fuel tank malfunction).

According to the documents you submitted with your request, this valve contains 0.035 grams of Diazodintrophenol (DDNP) and 0.0225 grams of Potassium Chlorate. These valves are completely contained in sealed cartridges and present no danger unless improperly disassembled. The U.S. Department of Transportation (USDOT) classifies these devices as UN0173, Release device, explosive, Hazard Classification 1.4S, under EX87711257.

You state that this device cannot be easily used for unlawful purposes and does not constitute a public safety or security hazard. You also stated that The Boeing Company will restrict the handling of these devices to trained specialists only and continue to store uninstalled devices in an explosives storage magazine.

After careful review, ATF has determined that the Conax Eager-Pak Valve, also known as Part Number 1215-129-01, as described above, does not pose a public safety or security hazard. Therefore, when being used for its intended purpose, the completely assembled devices will be considered special explosive devices and exempt from the requirements of 27 CFR, Part 555.

Mr. Tim Davids

Although we have determined these devices to be special explosive devices, the explosive materials used in their manufacture will remain subject to all of the provisions of 27 CFR, Part 555. The explosive materials are also subject to Federal regulations if removed from the devices. This exemption applies only to the devices specified in this letter. Any alteration to these devices, or the manufacture of different devices, will render this exemption void and necessitate a separate request for exemption.

ATF may modify or rescind this exemption should we determine that it poses a threat to public safety. This approval does not convey any rights or privileges contrary to any other Federal, State, and/or local laws. You should make a copy of this letter part of your permanent records and have it available for inspection by any ATF officer.

We trust the foregoing has been responsive to your request. If you have additional questions, please feel free to contact the Explosives Industry Programs Branch at 202-648-7120.

Sincerely yours,



Debra S. Satkowiak
Chief, Explosives Industry
Programs Branch

c: Area Supervisor, Seattle Area Office

491-944

RECEIVED

DEC 29 1987



US Department of Transportation
Research and Special Programs Administration

CONAX FLORIDA CORP.
Washington, D.C. MARKETING DEPT.

UNITED STATES OF AMERICA
DEPARTMENT OF TRANSPORTATION
OFFICE OF HAZARDOUS MATERIALS TRANSPORTATION
WASHINGTON, D.C. 20590

COMPETENT AUTHORITY APPROVAL CA-871218

1. This competent authority approval by the Office of Hazardous Materials Transportation of the United States Department of Transportation, issued in accordance with Part 2, Paragraph 1.3 of the International Civil Aviation Organization (ICAO) Technical Instructions, approves the classification and compatibility group assignment of, and assigns the appropriate proper shipping name to, certain explosives articles.
2. BASIS. This approval is based on the request from Conax Florida Corporation of St. Petersburg, Florida, dated November 20, 1987.
3. COMMERCIAL NAME. Explosive release device (P/N 1512-129-01, EX-8711257 and P/N 1811-002-09, EX-8711258).
4. PROPER SHIPPING NAME AND U.N. NUMBER. Release device, explosive, UN 0173.
5. U.N. CLASS AND DIVISION (AND COMPATIBILITY GROUP APPLICABLE). 1.4S
(The shipping name and class assignment are based on Bureau of Explosives Reports dated November 18, 1987, on file with the Office of Hazardous Materials Transportation).
6. PACKAGING.
Packing Instruction 162
7. EXPIRATION DATE. This approval remains valid until withdrawn or superseded by a revised approval.

Certified by:

Alan L. Roberts
Director
Office of Hazardous Materials Transportation

DEC 17

(DATE) _____



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

December 1, 1987

Ms. Tracy A. Thomas
Applications Engineer
Conax Florida Corporation
2801 74th Street, N.
St. Petersburg, Florida 33710

RECEIVED

DEC 1 1987

U.S. DEPARTMENT OF TRANSPORTATION
Hazardous Materials Division

Dear Mr. Thomas:

Based on the documentation submitted by Conax Florida Corporation in accordance with Sections 173.36 and 173.114a, Title 49, Code of Federal Regulations, the new explosive products listed below have been approved for shipment and are hereby classified as follows:

<u>Reference</u>	<u>Product Designation</u>	<u>Description</u>	<u>Hazard Classification</u>
EX-8711257	1512-129-01	Explosive release device	Class C explosive
EX-8711258	1811-002-03	Explosive release device	Class C explosive

Only explosives and explosive devices as described in the recommending agency report are authorized.

Should you have any questions regarding these classifications, this office can be reached on (202) 366-4514.

Sincerely,

for *Christine E. Whitely*
James Enoch Jones
Chief, Approvals Branch
Office of Hazardous Materials
Transportation



U.S. Department
of Transportation

Research and
Special Programs
Administration

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

The US Department of Transportation
Competent Authority for the United States

CLASSIFICATION OF EXPLOSIVES

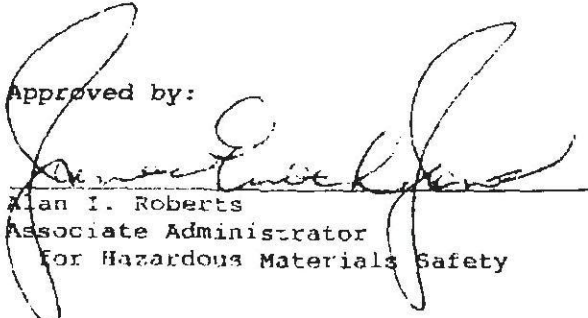
Based upon a request by Roger Light on behalf of Conax Florida Corporation, 2801 75th Street, North, St. Petersburg, Florida, the following items are classed in accordance with Section 173.56, Title 49, Code of Federal Regulations (49 CFR).

U.N. PROPER SHIPPING NAME AND NUMBER: Release devices, explosive, UN0173

U.N. CLASSIFICATION CODE: 1.4S

<u>REFERENCE NUMBER</u>	<u>PRODUCT DESIGNATION/PART NUMBER</u>
EX-8711257	1512-129-01
EX-8711258	1811-002-09

Approved by:



Alan I. Roberts
Associate Administrator
For Hazardous Materials Safety

09 23

(DATE)

27 56

MATERIAL SAFETY DATA SHEET

OMB Approval
No. 45-R0338

SECTION I

MANUFACTURER'S NAME AND FSCM (Federal Supply Code for Manufacturer)

Conax Florida Corporation 62323

EMERGENCY PHONE NO.

727-345-8000

ADDRESS (NUMBER, STREET, CITY, STATE and ZIP CODE)

2801 75TH Street North, St. Petersburg FL 33710

CHEMICAL NAME AND SYNONYMS:

TRADE NAME AND SYNONYMS

Eager-Pak Valve

CHEMICAL FAMILY

FORMULA

Conax P/N: 1512-129-01

FEDERAL STOCK NUMBER (FSN)

GROSS WEIGHT
(LBS)OUTSIDE PACKAGE DIMENSIONS
(INCHES)

MIL-STD-1341/NATIONAL FIRE PROTECTION ASSOCIATION STD 704M SIGNAL

FLAMMABILITY 2 HEALTH 1 REACTIVITY 1 SPECIFIC HAZARD N/A

SECTION II - HAZARDOUS INGREDIENTS

PAINTS, PRESERVATIVES, AND SOLVENTS	%	THRESHOLD LIMIT VALUE (UNITS)	ALLOYS AND METALLIC COATINGS	%	THRESHOLD LIMIT VALUE (Units)
PIGMENTS		N/A	BASE METAL		N/A
CATALYST		N/A	ALLOYS		N/A
VEHICLE		N/A	METALLIC COATINGS		N/A
SOLVENTS		N/A	FILLER METAL PLUS COATING OR CONE FLUX		N/A
ADDITIVES		N/A	OTHERS		N/A
OTHERS		N/A			N/A
HAZARDOUS MIXTURES OF OTHER LIQUIDS, SOLIDS, OR GASES				%	THRESHOLD LIMIT VALUE (Units)
45mg Diazodinitrophenol					

SECTION III
PHYSICAL DATA

BOILING POINT (°F.)	N/A	SPECIFIC GRAVITY (N ₂ O ₂)	N/A
VAPOR PRESSURE (XXX M _w)	N/A	PERCENT VOLATILE BY VOLUME (%)	N/A
VAPOR DENSITY (AIR=1)	N/A	EVAPORATION RATE (_____ =1)	N/A
SOLUBILITY IN WATER	N/A		
APPEARANCE AND ODOR			

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

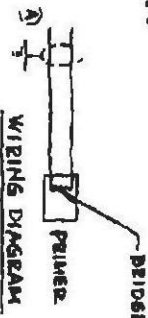
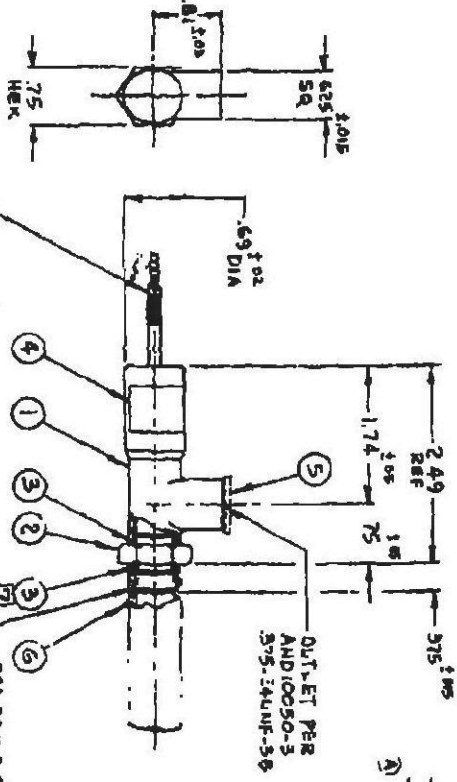
FLASH POINT (Method used)	FLAMMABLE LIMITS	LOWER EXPLOSIVE LIMIT	UPPER EXPLOSIVE LIMIT
EXTINGUISHING MEDIA			
SPECIAL FIRE FIGHTING PROCEDURES: USE NORMAL PRECAUTIONS AS IN APPROACHING ANY FIRE. REMOVE FROM HEAT IMMEDIATELY.			
UNUSUAL FIRE AND EXPLOSION HAZARDS:			

SECTION V HEALTH HAZARD DATA	THRESHOLD LIMIT VALUE: N/A		
	EFFECTS OF OVEREXPOSURE:		
	EMERGENCY AND FIRST AID PROCEDURES: STANDARD MEDICAL TREATMENT		
SECTION VI REACTIVITY DATA	STABILITY	UNSTABLE	CONDITIONS TO AVOID
		STABLE	X ELEVATED TEMPERATURES
	INCOMPATIBILITY (Materials to avoid)		
	HAZARDOUS DECOMPOSITION PRODUCTS		
	HAZARDOUS POLYMERIZATION	MAY OCCUR WILL NOT OCCUR	CONDITIONS TO AVOID
SECTION VII SPILL OR LEAK PROCEDURES	STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED		
	N/A		
	WASTE DISPOSAL METHOD		
SECTION VIII - SPECIAL PROTECTION INFORMATION	RESPIRATORY PROTECTION (Specify Type)		
	VENTILATION:	LOCAL EXHAUST	SPECIAL
	NONE		
		MECHANICAL (General)	OTHER
	PROTECTIVE GLOVES:	EYE PROTECTION:	
	GOOD PRACTICE	GOOD PRACTICE	
OTHER PROTECTIVE EQUIPMENT			
SECTION IX SPECIAL PRECAUTIONS	PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING: UNITS ARE COMPLETELY SELF-CONTAINED, AND PRESENT NO DANGER UNLESS IMPROPERLY DISASSEMBLED. STORE IN COOL, DRY AREAS.		
	OTHER PRECAUTIONS:		
SECTION X TRANS. DATA	PROPER SHIPPING (Article) NAME: Release Device, Explosive UN0173		DOT CLASSIFICATION: 1.4s (Class C)
	DOT LABEL 1.4s (Class C)	DOT MARKING 1.4s	EMERGENCY ACCIDENT PRECAUTIONS AND PROCEDURES: REMOVE FROM HEAT
	DOT PLACARD	PRECAUTIONS TO BE TAKEN IN TRANSPORTATION: AVOID ELEVATED TEMPERATURES	

U.S. GOVERNMENT PRINTING OFFICE: 1972 O-455-159

10/30/07

CUSTOMER REFERENCE COPY



- SYMBOLS:**
- 1 CONTACT TERMINAL
 - 2 CONTACT TERMINAL
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NOTES:-

- 1 ALUMINUM PARTS ANODIZED PER MIL-A-8625, TYPE I, CLASS I
- 2 TEST PER ATP-299
- 3 NAME PLATE TO INCLUDE CONAK-P/N, S/N, MFG DATE.
- 4 O-RING TO BE SUPPLIED ONLY WHEN VALVE ASSY IS SHIPPED SEPARATELY. RESTRICTION TORQUE FOR ADAPTER IS 190-230 IN-LBS.
- 5 O-RING, ITEM 3, TO BE SHIPPED IN SEPARATE BAG WHEN VALVE IS SHIPPED SEPARATELY. MARK BAG WITH PART NUMBER, P/N & CURT DATE.

VENDOR PRINT N REV C
 ENGR. ACCEPTED [Signature] DATE 11-1-07

491-944

REV	DESCRIPTION	DATE	APPROVED
A	REVISED PER EQ. 21815	10/30/07	[Signature]
B	REV PER EQ. 24136	11/1/07	[Signature]
C	REV PER EQ. 24052	11/1/07	[Signature]

QTY	PART NO	DESCRIPTION	MATERIAL	DISPOSITION
1	CC-209-01	LUBRICANT		
1	1126-007-02	CAULK		
1	CR-311-1	PROTECTIVE PLUG		
1	R26-019-01	NAME PLATE		
2	R202-905-03	10° RING		
1	104-009-01	ADAPTER		
1	161-007-01	EAGER-PAK 510-ASSY		
1	1512-129-01	VALVE ASSY		

CONOX CORPORATION
 VALVE ASSEMBLY,
 EAGER-PAK REPLACEMENT
 EXPLOSIVE ACTIVATED

QTY	UNIT	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE
1	1	1	1	1

491-944 1512-129-01