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COMMITTEE OF EXPERTS ON THE
TRANSPORT OF DANGEROUS GOODS

Sub-Committee of Experts on the
Transport of Dangerous Goods
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MISCELLANEOUS DRAFT AMENDMENTS TO THE MODEL REGULATIONS
ON THE TRANSPORT OF DANGEROUS GOODS

Packing instructions

Transmitted by the Expert from Sweden

Proposal in connection with document ST/SG/AC.10/1998/16/ Add.1 and Add.2

1. Introduction

In document ST/SG/AC.10/1998/16/Add.2 UN number 3268 Airbag inflators, airbag modules or seat belt pretensioners is allocated the packing instruction P 902. In ST/SG/AC.10/1998/16/Add.1 the packing instruction P 902 states that UN 3268 shall conform to special provision 235. A part of the suggested text for special provision 235 is as follows:

"If the airbag inflator unit satisfactorily passes the 6 (c) test, it's not necessary to repeat the test on the airbag module itself."

In Sweden we believe this text insufficient. For instance when testing the inflator unit itself in a bonfire test the unit may explode within 5-10 minutes but without any risk for projection and the unit will pass the test.

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The same airbag inflator unit but now assembled in a complete air bag module may in a bonfire test react differently. The reaction will be delayed, but projections may occur, as a consequence of the reaction and the air bag module may not be able to pass the test. Instead we have seen examples of behaviours that should give classifications in 1.4G or even 1.2 G!

In both cases we have identical inflator units, but in one of the cases it will fail to pass the Bonfire test. We believe therefore that a change in special provision 235 is necessary. There is a risk not to be able to get the correct identification of the reaction when testing the inflator unit itself without having to test the complete airbag module.

This can imply a safety risk for the emergency responders situated around a possible scene of an accident with airbags transported as packages of class 9.

Proposals

In document ST/SG/AC.10/1998/16/Add.1 delete the sentence: If the airbag inflator unit satisfactorily passes the 6 (c) test, it's not necessary to repeat the test on the airbag module.

The text in special provision 235 will then be as follows:

"235 This entry applies to articles which may be classified in Class 1 in accordance with 2.1.1.1, 2.1.1.2 and 2.1.1.3, which are used as life-saving vehicle air bags or seat-belts, when transported as component parts and when these articles as presented for transport have been tested in accordance with Test series 6 (c) of Part I of the Recommendations on the Transport of Dangerous Goods, Manual of Tests and Criteria, with no explosion of the device, no fragmentation of device casings, and no projection hazard or thermal effect which would significantly hinder fire-fighting or other emergency response efforts in the immediate vicinity. ~~If the air bag inflator unit satisfactorily passes the series 6(c) test, it is not necessary to repeat the test on the air bag module itself. Such air bag inflators or modules or seat-belt pretensioners may be transported unpackaged in dedicated handling devices or transport units when transported from where they are manufactured to an assembly plant.~~ Air bags or seat-belts installed in vehicles or in completed vehicle components such as steering columns, door panels, seats, etc. are not subject to these Regulations."
