



Infinity Air, Inc.

LOS ANGELES • SEATTLE • MIAMI

Allflight

SEATTLE PK3R654Y • MIAMI 8A9R791B

HOW I GOT MY FFL FORM THE BATF



PN 5262100

Description: Goodrich Actuator



WHAT MADE THIS PART Dangerous?



WHAT WERE WE REQUIRED TO DO? – Per the OEM



From the OEM – UTC Aerospace

Environmental, Health and Safety Manager.

Feb. 2016

**If someone is possessing an explosive item –
they must have a license to do so. We cannot
ship material to anyone who is not permitted to
possess it.**



Approval for our storage of the door latches per BATF codes which are numerous

[Storage Requirements](#)

[Explosive Types and Storage](#)

[Storage Security](#)

[Storage Safety](#)

[Tables of Distances](#)

[Barricades](#)

[Bullet Resistance](#)

[Recordkeeping Requirements](#)

[Storage Variances](#)



From the OEM – UTC Aerospace

Environmental, Health and Safety Manager.

March 2016

Infinity Air, ... has been receiving these units under pretense since 2006... we are in serious violation of Federal laws...



Bureau of Alcohol, Tobacco, Firearms and Explosives



Law Enforcement Agency in the US
Department of Justice that regulates
the use of Tobacco, Firearms and
Explosive devices, including
Fireworks use and display



SOME BATF STORAGE REQUIREMENTS!



All our facilities would have been required to have specific distances from public roadways, highways, specific distances from nearest inhabited buildings etc.



Our facilities were physically impossible to meet the BATF distance requirements for storage of mild explosives

Tarzana Facility on Ventura Blvd in San Fernando Valley

Miami Facility in busy Business Park with other Businesses Nearby

Seattle Repair Facility adjacent and **Sharing Wall** with in business park with other facilities



HOW DID WE OVERCOME

- Questioned the OEM interpretation of the regulation
- Insisted direct contact with an Agent at the correct Gov Agency
- Insisted an actual contact at BATF
- Insisted our contact @ BATF Mr. Michael O'Lena review the case



REPRESENTATIVE AT BATF

Mike O'Lena
Program Manager
Explosives Industry Programs
Branch
Bureau of Alcohol, Tobacco,
Firearms and Explosives



BATF ISSUES EXEMPTION FOR PARTS NOT INDIVIDUAL BUSINESSES!

**ON 22 APRIL WE WERE ADVISED
BY MR O'LENA THAT THE SUBJECT
PART NUMBER HAS BEEN
GRANTED AN EXEMPTION**





U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives

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Mr. Jimmy Wu

Washington, DC 20226

www.atf.gov

May 9, 2016

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Mr. Jimmy Wu, President/CEO
Infinity Air Group
8100 NW 21st Street
Doral, Florida 33122

Dear Mr. Wu:

This is in response to your e-mail, dated April 21, 2016, to the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF). Infinity Air Group, (Infinity) requested a special device exemption, pursuant to the regulations at 27 CFR § 555.32, for aircraft (Cartridges). You provided the U.S. Department of Transportation (DOT) certification approval, material safety data sheet, shipper's declaration, and photos.

According to your request, Infinity acquires the Cartridges (Goodrich Part-Model Number 5262100) from Universal Propulsion Company for further distribution to commercial airlines, airplane operators) who install them on aircraft. The Cartridge (i.e. Cabin Door Opening/ Snubbing) is designed to act as a powered hinge that forcefully opens an emergency door in the event of an emergency.

In competent authority approval EX1993060241 to Universal Propulsion Company, dated October 10, 2012, DOT classified the Cartridges as Class 1.4C explosives (Cartridges, UN0276). The Cartridge has a maximum net explosives weight of 1.06 gram: 8028 (HMX, Hycar Rubber, Salicylic Acid), Black Powder, High Temperature (RDX, Diphenylamine, Nitrocellulose), and a percussion primer.



The regulation at 27 CFR § 555.32 states, in part, that "The Director may exempt certain explosive actuated devices, explosive actuated tools, or similar devices from the requirements of this part. A person who desires to obtain an exemption under this section for any special explosive device, which as designed does not constitute a public safety or security hazard, shall submit a written request to the Director."

After careful review, ATF has determined that the aforementioned Cartridge (Part-Model Number 5262100) does not pose a threat to public safety when possessed and used for its intended purpose in aircraft safety systems. Therefore, we are exempting them as special explosive devices pursuant to 27 CFR § 555.32.

Although we have determined that the device described in your request is exempt from ATF explosive regulations, the explosive materials used in its manufacture are subject to all of the provisions of 27 CFR, Part 555. Any explosive materials removed from this device is also subject to regulation. Any alterations to the device or the packaging of the device will render this exemption void and necessitate a separate request for exemption. Further, the manufacture of a different device will necessitate a separate request for exemption.

We have also added an addendum without proprietary information that Infinity can provide to its customers who acquire the Cartridge.

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,

William O'Brien
Acting Chief, Explosives Industry
Programs Branch

cc: raymonds@infinityair.com

After careful review, ATF has determined that the aforementioned Cartridge (Part-Model Number 5262100) does not pose a threat to public safety when possessed and used for its intended purpose in aircraft safety systems. Therefore, we are exempting them as special explosive devices pursuant to 27 CFR § 555.32.

MAY 9TH 2016





U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives

Washington, DC 20520

www.atf.gov

SPECIAL EXPLOSIVES DEVICE DETERMINATION

Per a request by Infinity Air Group, the Bureau of Alcohol, Tobacco, Firearms and Explosives has determined the following explosive device meets the special explosive device requirements in accordance with 27 CFR § 555.32.

ATF Tracking Number:

16-803370

U.N. Proper Shipping Name and Number:

Cartridges, power devices, UN0276

U.S. Department of Transportation Approval Numbers:

EX1993060241

Product Designation/Part Number:

Goodrich Actuator – Door Opening/Snubbing (Part-Model Number 5262100)

NOTES:

The explosive materials used in their manufacture are subject to all of the provisions of 27 CFR, Part 555. Any explosive materials removed from this device are also subject to regulation. Any alterations to the device will render this exemption void.

DATED:

5/9/2016

William O'Brien
Acting Chief, Explosives Industry
Programs Branch



THE HAPPY ENDING

