



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives

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 explosive device exemption, pursuant to the regulations at 27 CFR § 555.32, for aircraft safety cartridges (Cartridges). You provided the U.S. Department of Transportation (DOT) competent authority 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 companies (e.g. airlines, airplane operators) who install them on aircraft. The Cartridge (i.e. Goodrich Actuator – Door Opening/Snubbing) is designed to act as a powered hinge that forcefully releases and ejects an emergency door in the event of an emergency.

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

Mr. Jimmy Wu



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 explosives 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