



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

AUG 30 2006

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

Mr. Randy Love
Daisy Outdoor Products
11823 Lime Kiln Road
Neosho, MO 64850

Ref. No. 06-0179

Dear Mr. Love:

This is in response to your July 17, 2006 letter requesting clarification regarding the applicability of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) to a compressed air gun. Specifically, you ask what requirements in the HMR would apply to a compressed air gun that is shipped uncharged.

The HMR apply to the transportation of hazardous materials and articles containing hazardous materials in commerce. An air gun that is transported uncharged; that is, with no compressed gas in the cylinder, is not subject to the HMR. You may wish to contact the Consumer Product Safety Commission concerning requirements in its regulations for the manufacture of your product.

I hope this information is helpful.

Sincerely,

Hattie L. Mitchell, Chief
Regulatory Review and Reinvention
Office of Hazardous Materials Standards



060179

171.1

Daisy Outdoor Products

Satterthwaite
§ 171.1
Applicability

06-0199

Edward T. Mazzullo
Director of Hazardous Materials Standards
US DOT/PHMSA (PHH-10)
400 7th St. Southwest
Washington, DC 20590-0001

Dear Mr. Mazzullo;

Daisy Outdoor Products is a manufacturer and importer of airguns and various other outdoor products. Our gun propulsion methods include; spring air, pneumatic pump and compressed CO2.

We do not currently sell a compressed air gun. We are in the process of developing a new compressed air gun that will incorporate the use of many components from one of our CO2 powered rifles. To follow with the same styling of the CO2 rifle this new gun will have a high pressure air cylinder, (3000psi), approximately the same size as our current CO2 cylinder. This new high pressure air cylinder will be 1" in diameter with an overall length of 14". It will house a firing mechanism and fill port in one end and be equipped with a pressure gauge at the opposite end. The air cylinder will be made of steel. The fittings will be made of brass. The firing mechanism will be made of a combination of steel and acetal plastic components.

Safety of this air cylinder and firing mechanism is very important. That brings me to the question of qualification standards this 3000psi air cylinder must meet. As you should know, at Daisy all guns are shipped unloaded, uncocked and not charged for safety.

Will you confirm that this cylinder would require DOT certification and markings in a written reply to us please?

Thank you in advance for your response.

Regards,



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