Cataloging and Legal Requirements for Packaging of Cartridge/Propellant Actuated Devices (CADs/PADs)

Presented at:
CAD/PAD Technical Exchange

Presented by:
Naval Packaging, Handling, Storage and Transportation (PHS&T) Center
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Distribution Statement A (22-089): Approved for public release; distribution is unlimited.
General/Overview

- NAVSUP interplay of the Technical Agents
- Getting through gating and status code 9
- Meeting harmonized 49 CFR requirements
- Meeting MIL STD 129 requirements
- All tied to Special Packaging Instruction (SPI)s or Ship Pack Condition (SPC) drawings
- Reviews against cataloging
- Non-standard packaging

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Navy Cataloging

• Managed by NAVSUP GLS for the assignment and activation on NSN and DODIC/NALC fed into the Federal Logistics Information System
• Requires the review and signoff of Technical Agents for HERO, ESD, Demil, Hazard Classification, Physical Security and Packaging
• Many of the other Technical Agents review the item and make their assessment based on effects of the packaging involved, thus a deviation from the packaging can have negative safety effects for the users

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New Cataloging Phase

- NAVSUP has implemented a “gating” process for getting into the cataloging process
- This keeps items from stagnating in status code 9 when they weren’t mature Technical Data Package (TDP) concepts to begin with
- From a packaging perspective to get past the gate you need the following information:
  
  - Concept of packaging that will lead to a SPI/SPC
    
    - Quantity per inner pack and outer pack
    - Selected type of packaging (fiberboard/wood/steel…box, drum…)
    - Explanation of packaging through the logistics cycle (wholesale and single configuration to demil, wholesale>retail through demil, or wholesale>retail>demil configurations
    - Timeline/plan for SPI or SPC creation

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49 CFR Legal Requirements

• Reviewed during the cataloging process:

  ➢ Proper Shipping Name (location size)
  ➢ UN Identification Number (location)
  ➢ UN Specification Packaging Marking (location, format, Size)
  ➢ Hazard Classification Label (location)
  ➢ If not moved by UN Specification Packaging

    ✓ DOT Exemption
    ✓ DOT Special Permit (DOT-SP)
    ✓ Certificate of Equivalency (COE)
    ✓ Competent Authority Approval (CAA for packaging)

• Also partially reviewed (packaging configuration) during contract acceptance
MIL STD 129 Requirements

- Reviewed during the cataloging process
- Includes the legal marking requirements of the 49 FR
- Additionally physical marking requirements of inner packs
  - NSN and DODIC
  - Quantity
  - Lot
  - Serial number

- Additional physical marking for outer packs
  - All the marking for inner pack reproduced plus:
    - Box end lot and DODIC numbers (both ends)
    - If Air Force controlled (SPI number)
    - 2D Barcode with HRI label with condition code / label and separate Material Condition Code tag/label

- Also partially reviewed (packaging configuration) during contract acceptance

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SPIs and SPCs

- One stop shop for all the requirements in one document
- Define the packaging for one or more logistics phases (wholesale, retail, demil)
  - Dimensions, and type/grade/spec
  - 49 CFR requirements (closing/marketing/labeling)
  - MIL STD 129 requirements met for marking and labeling
- Replacement for the old section 5 packaging in an item specification
- No longer accepting “Commercial Best Practices”
  - Non hazardous components cataloged to dimensions and Spec/Type/Grade/Class/Style
  - Hazardous components SPI or SPC required
Reviews Against Cataloging

- POP reports reviewed as part of contract acceptance:
  - Packaging configuration in POP report reviewed against cataloged data in NAVSEA SW020-AC-SAF010 (TRANSPORTATION AND STORAGE DATA FOR AMMUNITION, EXPLOSIVES, AND RELATED HAZARDOUS MATERIALS)

- Common findings that cause rejection:
  - Use of a 4GV packaging that calls out vermiculite
  - Dimension not per the SPI
  - Container material not per the SPI
  - Quantity per unit pack or outer not consistent with the TDP
Deviations Against Cataloging

• Deviations against cataloging initiate a Non-Standard Packaging (NSP) letter
  ➢ Letter process created to ensure when a RFV / RFD for packaging are made with consideration to other Technical Agent requirements
  ➢ Creates a feedback look to change TDPs
Questions?

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