



U.S. Department
of Transportation
**Research and
Special Programs
Administration**

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

AUG 7 1998

Mr. Rick Wells
Traffic Manager
Wright Corporation
P.O. Box 402
Riegelwood, NC 28456

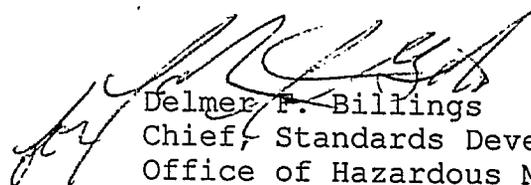
Ref. No. 98-0210

Dear Mr. Wells:

This is in response to your letter of July 23, 1998, regarding securement requirements under the Hazardous Materials Regulations (HMR 49 CFR Parts 171-180). Specifically you describe a scenario consisting of either 2000 pound supersacks or 50 pound bags (layered with glue between each layer) loaded onto small unsecured pallets. You state that each unit is loaded with the bags pressed against each other and the trailer walls and you use load locks on the last two units.

As provided by § 177.834(g), packages of hazardous materials must be so braced as to prevent motion within the transport vehicle. The scenario you provided seems to meet this requirement; however, movement of packages within the transport vehicle would be a violation of the HMR.

Sincerely,



Delmer F. Billings
Chief, Standards Development
Office of Hazardous Materials Standards

**WRIGHT CORPORATION**

*LaValle
§ 177.834*

July 23, 1998

Mrs. Diane LaValle
U.S. Department of Transportation
400 Seventh Street, S.W.
Room # 8102 DHM-10
Washington, D.C. 20590

Dear Mrs. LaValle:

Per our telephone conversation I am writing this letter to clarify our request for a ruling on CRF 177.834G, and how it relates to the packaging and shipment of our product, Hexamethylenetetramine. This product is shipped in either 2,000 LB FIBCs or in 50 LB bags (7 bags per layer, 6 layers high with glue between each layer). These bags are placed on a slightly undersized and unsecured pallets. These units, when loaded, are placed with the bags pressed against the adjacent units bags. Therefore, the bag or bags are blocking themselves against each other and the trailer walls. This along with load locks on the last two units should prevent motion when in transit.

With the use of performance oriented packaging and our blocking method, we feel that each truck load of material will arrive at it's destination safely as has been our history for many years now.

Sincerely,

Rick Wells

Rick Wells
Traffic Mgr.
Wright Corp