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

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

JUN 7 2001

Jeffrey A. Obright, SSgt
USAF
5 TRANS/LGTTC
341 Bomber Blvd.
Minot AFB, ND 58705

Ref. No: 01-0123

Dear SSgt. Obright:

This responds to your letter of May 14, 2001, requesting clarification on the segregation requirements for hazardous materials under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically you ask whether separate dromedary units loaded on a flatbed truck are considered separate transport vehicles under the HMR.

The answer is no. Section 177.848 of the HMR prohibits the transportation of Class 8 liquids on the same transport vehicle as Division 1.1, 1.2, and 1.3 explosives. A dromedary unit is not a transport vehicle. Thus, the use of dromedary units to separate a Class 8 material from a Division 1.1, 1.2, or 1.3 explosive on a flatbed truck is prohibited. However, the configuration you provided in which the Class 8 material is transported in a dromedary unit on the tractor and the explosive materials are in separate dromedary units on the flatbed does conform to HMR requirements.

I hope this information is helpful.

Sincerely,

John A. Gale
Transportation Regulations Specialist
Office of Hazardous Materials Standards

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177.848

La Valle
§177.848
Segregation
01-0123

DEPARTMENT OF THE AIR FORCE
HEADQUARTERS, 5TH LOGISTICS GROUP (ACC)
Minot Air Force Base, North Dakota

14 May 01

MEMORANDUM FOR: USDOT/RSPA
ATTN: EDWARD MAZZULLO
400 7th Street SW
Washington DC 20590

FROM: 5 TRANS/LGTTC

SUBJECT CLARIFICATION OF CFR 49 PT 177

1. I am requesting clarification of CFR 49 for the transport of noncompatible hazardous materials aboard a flatbed trailer. Are dromedary units considered separate transport units? Is a flatbed considered one transport unit although it contains several separate dromedary units?

2. On 14 May 01 a situation arose at Minot AFB ND which prompts this request. A diagram is provided to clarify this request. A shipment of 1.1 explosives was loaded on the truck by a previous installation. We had a class 8 shipment to be loaded on the same asset. Both shipments were secured in different dromedaries. The 1.1 shipment was loaded in the first dromedary on the flatbed. A 1.3 shipment was in the second dromedary. Our class 8 shipment was in the third dromedary. A 1.4 shipment was in the fourth dromeday. After loading our class 8 shipment the motor carrier stated they could not transport the materials on the same flatbed although they were segregated into separate dromedaries. We then removed the dromedaries containing the 1.1 and 8 materials. We then loaded the class 8 on the truck and the 1.1 on the trailer. The truck and trailer now conformed to CFR 49. RSPA agreed each dromedary was a separate transport unit when I contacted them. However, CFR 49 doesn't state the dromedaries are separate transport units. RSPA recommended I forward a letter to your office requesting clarification.

3. I respectfully request clarification be provided to this office to preclude a reoccurence of this nature. Thank-you for your attention in this matter.

4. Please contact me at 701-723-3242 if you have any questions concerning this request for clarification of the transport of non-compatible hazardous materials. My mailing address is 5 TRANS/LGTTC 341 Bomber Blvd Minot AFB ND 58705.

JEFFREY A. OBRIGHT, SSgt, USAF
NCOIC, Outbound Freight

Global Power For America