



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, D.C. 20590

APR 09 2012

Mr. Rick Araniz
Director of Operations
Central & Western Area
Boyle Transportation
15 Riverhurst Road
Billerica, MA 01821-3425

Ref. No.: 12-0064

Dear Mr. Araniz:

This responds to your February 15, 2012 letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the highway compatibility and segregation requirements for Division 1.1 materials. Specifically, you ask whether “UN0065, Cord, detonating, *flexible*, 1.1D, PG II” can be transported by highway on the same motor vehicle as “UN0048, Charges, demolition, 1.1D, PG II.”

The answer is yes. As provided in § 177.848(d), the highway segregation requirements indicate how hazardous materials must be stored, loaded, or transported in accordance with the Segregation Table. A “*” in the Segregation Table indicates that segregation among different Class 1 (explosive) materials is governed by the Compatibility Table in paragraph (f). Per the Compatibility Table for Class 1 (explosive) materials provided in § 177.848(f), these two hazardous materials are authorized to be transported on the same motor vehicle. Additionally, per the definitions of “Cord, detonating, flexible” and “Detonators” in § 173.59, UN0065 is not defined as a detonator and therefore is permitted to be transported on the same motor vehicle with UN0048.

I hope this satisfies your inquiry. Please contact us if we can be of further assistance.

Sincerely,

T. Glenn Foster
Chief, Regulatory Review and Reinvention Branch
Standards and Rulemaking Division

Engrum, Helen (PHMSA)

Nickels
\$ 177.835(g)
\$ 173.61
\$ 173.159
Explosives
12-0064

From: Rick Araniz [Rick.Araniz@BOYLETRANSPORT.COM]
Sent: Thursday, February 23, 2012 12:54 PM
To: Engrum, Helen (PHMSA)
Subject: FW: Question on Class 1
Attachments: 2008 11 17 PHMSA ltr & regs.pdf

Good Afternoon Ms. Engrum,

Just following up to see if you got my last email.

Thank you

Respectfully,
Rick Araniz
Director of Operations
Central & Western Area
Boyle Transportation
978.670.3404 Direct
866.904.4717 Fax
866.305.1134 Operations Fax
Operations Center 800.343.2004
rick.araniz@boyletransport.com
www.boyletransport.com

From: Rick Araniz
Sent: Wednesday, February 15, 2012 5:17 PM
To: 'helen.engrum@dot.gov'
Subject: RE: Question on Class 1

Dear Ms. Engrum,

The interpretation letter enclosed states that "Fuzes, detonating," for compatibility purposes should be considered "detonators"

My question is, based on this letter and section 177.835(g) would this also apply to "Cord, detonating" (UN0065, UN0289, UN0102, UN0290 and UN0104). Based on my reading of the regulation it would appear that you are not allowed to load "Detonators" with "detonating cord Division 1.4 material" but it does not state anything about detonating cord that is 1.1 or 1.2.

Example: Can the following be loaded together:

UN0065, Cord, Detonating 1.1D with UN0048, Charges, Demolition, 1.1D.

Normally compatibility group D would ride together, but if UN0065 is considered a "detonator" then it would not be compatible?

Respectfully,
Rick Araniz
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From: helen.engrum@dot.gov [<mailto:helen.engrum@dot.gov>]
Sent: Tuesday, February 14, 2012 5:07 PM
To: Rick Araniz
Subject: RE: Question on Class 1

It depends on the actual question. What is your question?

From: Rick Araniz [<mailto:Rick.Araniz@BOYLETRANSPORT.COM>]
Sent: Thursday, February 09, 2012 10:43 AM
To: Engrum, Helen (PHMSA)
Subject: Question on Class 1

Good Morning Ms. Engrum,

I have a Class 1 compatibility question. To whom can I call or email that question?

Thank you.

Respectfully,
Rick Araniz
Director of Operations
Central & Western Area
Boyle Transportation
978.670.3404 Direct
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866.305.1134 Operations Fax
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