

**From:** [INFOCNTR \(PHMSA\)](#)  
**To:** [Baker, Yul \(PHMSA\)](#)  
**Cc:** [Hazmat Interps](#)  
**Subject:** FW: Letter of Interpretation Request. DOT SP 11156  
**Date:** Wednesday, February 18, 2026 9:48:22

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Good morning,

Please see the below interpretation request.

Let us know if you need anything,

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**From:** Matthew Spina <[xplosivesolutionsllc@gmail.com](mailto:xplosivesolutionsllc@gmail.com)>  
**Sent:** Tuesday, February 17, 2026 4:37 PM  
**To:** INFOCNTR (PHMSA) <[INFOCNTR.INFOCNTR@dot.gov](mailto:INFOCNTR.INFOCNTR@dot.gov)>  
**Subject:** Letter of Interpretation Request. DOT SP 11156

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I have a question regarding this language in Special Permit 11156:

"PACKAGING: Packaging prescribed is a non-specification, non-reusable three-, four-, or five-wall kraft (or equivalent) paper bag with an inner barrier ply of plastic. The packaging meets all of the construction requirements applicable to a UN 5M2 bag, as stated in § 178.521, except that the stitched top closure or glued seams with sealing valve closure is not waterproof or completely sift-proof."

If the stitch closure is not sift proof, what would be the outcome of ANFO prills sifting out during transportation? Would this lead to a violation of 173.24b? Even under the most stringent and cautious handling procedures, ANFO prills have been known to release from 5M2 bags.

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