



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, DC 20590

September 30, 2026

Kailee Tubbs  
Williams International  
2000 Centerpoint Parkway  
Pontiac, MI 48341

Reference No. 26-0048

Dear Ms. Tubbs:

This letter is in response to your April 10, 2026 letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the classification of an engine. You note that the engine assembly includes an igniter classified as “UN0325, Igniter, 1.4G,” which is both an integral component of the engine and required for the operation of the engine. Specifically, you ask if the basic description “UN3166, Engine, internal combustion, flammable liquid powered, 9” is an appropriate classification and ask for confirmation that the engine with installed igniter would be eligible for the provisions of § 173.220(f)(1).

No. Following recent regulatory updates<sup>1</sup>, the Proper Shipping Name (PSN) associated with UN3166 has been amended to “Vehicle, flammable gas powered” or “Vehicle, flammable liquid powered.” Therefore, UN3166 is no longer appropriate for your engine assembly. However, it is still correct that under § 173.56(i) the Associate Administrator (AA) for the Office of Hazardous Materials Safety may specify a classification or except an explosive material from the requirements of the HMR. In a previously issued letter of interpretation the AA determined that your 1.4G igniter is an integral part of the combustion engine and does not pose a hazard requiring an approval and may be excepted if the requirements of § 173.220(f)(1) are met.<sup>2</sup>

Under § 173.22, it is the shipper’s responsibility to classify a hazardous material properly, in accordance with classification criteria provided in the HMR, prior to offering it for transportation to—or within—the United States. This Office does not normally perform this function. However, provided the 1.4G igniter is still an integral component of the engine and necessary for the

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<sup>1</sup> 82 FR 15796 (March 30, 2017)

<sup>2</sup> Williams International, *Letter of Interpretation Reference Number 17-0039*, available at: <https://www.phmsa.dot.gov/regulations/title49/interp/17-0039>

operation of the engine in accordance with § 173.220(f)(1), a different entry, such as “UN3530, Engine, internal combustion, 9” may be more appropriate.

I hope this information is helpful. Please contact us if we can be of further assistance.

Sincerely,

A handwritten signature in blue ink, reading "Alexander Wolcott". The signature is fluid and cursive, with a long horizontal stroke extending from the end.

Alexander Wolcott  
Acting Chief, Regulatory Review & Reinvention  
Standards and Rulemaking Division



10 April 2026

U.S. Department of Transportation  
1200 New Jersey Avenue, SE  
Washington, DC 20590  
855-368-4200

Subject: Williams International WJ38-7K Hazard Classification

Reference:

- (1) PacSci Igniter DOT Classification of Explosives (REF: EX2005010294)
- (2) DOT Letter to Williams International 13 November 2014 (REF: 14-0071)

To Whom it May Concern,

Williams International produces the WJ38-7K engine for Kongsberg Defence & Aerospace (KDA). The WJ38-7K engine basic description is "UN3166, Engine, internal combustion, flammable liquid powered, Class 9". The engine assembly includes an igniter classed as "UN0325, Igniter, 1.4G" which is both an integral component of the engine and required for the operation of the engine. The igniter has been assigned to the US Department of Transportation (DOT) approval number EX-2005010294 dated June 28, 2024 (Attachment 1).

On 13 November 2014, DOT provided a letter of clarification (Attachment 2) Ref. No. 14-0071 to Williams International concerning this WJ38-7K engine assembly. The Associate Administrator for Hazardous Material Safety determined the 1.4G igniter, an integral component of the combustion engine, does not pose a hazard requiring approval and may be excepted if the requirements of § 173.220(h)(1) are met. In summary, and as noted by the DOT in its letter, it is appropriate that the WJ38-7K engine ships as a UN3166 with an installed UN0325 1.4G igniter.

The KDA customer needs to ship engines back to Williams International for service and is looking for more direct language regarding the clarifications of the DOT provisions listed in reference 2. While this is an international shipment, Williams International is not looking for the DOT to opine on foreign/ international regulations. This simply serves as assurance to the customer that the engines can be transported once returned to the United States. Please see further information on the request below:

The engine assembly has not been altered or modified by the KDA customer. The current dilemma is that local authorities in Norway require more direct and conclusive language prior to releasing engine shipments back to the United States. KDA has therefore requested DOT provide a letter of clarification that specifies ***"the Engine WJ38-7K with Class 1 UN0325 component installed, can be shipped as Class 9 UN3166"***. Can DOT please provide such a letter of clarification?

Thank you in advance for your assistance on this matter. If additional explanation is required, then please contact Williams International at 248-960-2949 or 248-807-4241.

Sincerely,

Kailee Tubbs

*Kailee Tubbs*

WILLIAMS INTERNATIONAL