



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

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

DEC 27 2001

Mr. William R. Frerichs
Department of the Army
US Army Defense Ammunition Center
1 C Tree Road
McAlester, OK 74501-9053

Ref. No. 01-0294

Dear Mr. Frerichs:

This responds to your November 19, 2001 letter requesting additional clarification of our response letter Ref. No. 01-0280 regarding segregation requirements under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask whether a dromedary unit that is attached to a Heavy Expanded Mobility Tactical Truck with a Load Handling System (HEMTT-LHS), equipped with a flatrack with cargo, is considered to be a separate transport vehicle from the dromedary box. You intend to transport incompatible explosives separated in this manner.

It is the opinion of this Office that a dromedary box loaded with explosives attached to a HEMTT-LHS that also has a flatrack loaded with explosives is considered to be one transport vehicle, and, is not acceptable for hazardous materials, including incompatible explosives, that may not be transported on the same transport vehicle under § 177.848. However, if the flatrack loaded with explosives is loaded onto a separate trailer attached to the back of the HEMTT-LHS, the combination motor vehicle is considered to be two separate transport vehicles, and is acceptable for hazardous materials that require segregation of incompatible explosives on the same transport vehicle.

I hope this additional clarification on transporting incompatible explosives is helpful.

Sincerely,

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



010294

177.848



REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
DEFENSE AMMUNITION CENTER
McAlester, Oklahoma 74501-9053

Boothe
§ 177.848
Segregation
01-0294

SOSAC-DE

November 19, 2001

Mr. Delmer F. Billings
Chief, Standards Development
Office of Hazardous Materials Standards
400 7th Street SW
Washington, DC 20590

SUBJECT: Request for Clarification of Response Letter

1. This is a request for a clarification to your response letter dated Oct 30, 2001 (Ref. No:01-0280).
2. The DROM box with the incompatible explosive items is attached directly to the Heavy Expanded Mobility Tactical Truck with the Load Handling System (HEMTT-LHS). The HEMTT-LHS vehicle transports the primary cargo on the demountable flatrack. Once the HEMTT-LHS arrives at destination, the flatrack with cargo is offloaded to the ground and the HEMTT-LHS with the DROM box and incompatible items drives away.
3. This office believes that the HEMTT-LHS with the DROM box is considered a separate transportation vehicle from the demountable flatrack with cargo.
4. Are we correct in our interpretation that the HEMTT-LHS with the DROM box and incompatible items is a separate transportation vehicle from the demountable flatrack with cargo? Also, does the HEMTT-LHS equipped with the DROM box with incompatible items comply with the 49 CFR, section 177.848, Segregation of Hazardous Materials?
5. Enclosed are your response letter, our original request letter, and the background information on dromedary box and the HEMTT-LHS vehicle.
6. Point of contact is Mr. Michael Bartosiak, SMAAC-DET, commercial telephone number (918) 420-8083.

.for the Director:

Encl

William R. Frerichs
William R. Frerichs
Associate Director for Engineering