



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

JAN 6 1998

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

Mr. Robert C. Franz
61 Roosevelt Boulevard
Florham Park, NJ 07932

Dear Mr. Franz:

This is in response to your letter dated September 27, 1997, regarding the transportation of safety matches under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask why safety matches are regulated under the HMR.

Safety matches are regulated as a Division 4.1 (flammable solid) material. Section 173.124 (a)(3)(i) defines one category of readily combustible solids as materials that are solids which may cause a fire through friction, such as matches. Safety matches meet this definition and are regulated under the HMR. The Hazardous Materials Table (HMT) in § 172.101 lists "Matches, safety (*book, card or strike on box*)" as a proper shipping name.

Column (8A) of the HMT lists an exception for safety matches under § 173.186. Section 173.186 (c) states that safety matches must be tightly packed in securely closed inner packagings to prevent accidental ignition under conditions normally incident to transportation, and further packed in outer fiberboard, wooden, or other equivalent-type packagings. These matches in outer packagings not exceeding 23 kg (50 lbs.) gross weight are not subject to any other requirement (except marking) of the HMR. These packagings may be packed in the same outer packaging with materials not subject to the HMR. Those who offer for transportation packages of safety matches which exceed 23 kg must adhere to all the requirements of the HMR including shipping papers, marking, labeling, placarding, and training. Section 171.11 authorizes the use of the International Civil Aviation Organization's (ICAO) Technical Instructions as an alternative to 49 CFR for air shipments. However, ICAO does not provide the 23 kg exception for safety matches.

Please note that the United States Post Office has its own set of hazardous materials transportation guidelines. Shipments of hazardous materials made via the United States Postal Office are not subject to the HMR.

I hope this information is helpful. If you need further assistance, please do not hesitate to contact us.

Sincerely,

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

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Handwritten:
File: 173.186
SC: 518

Mr. Edward Muzzullo
Research and Special Program Administration
Hazardous Materials Safety
400 7th Street S.W.
Washington, DC 20590

September 27, 1997

Dear Mr. Mazzullo:

During my travels over the past 30 years I generally picked up matchbooks from hotels, restaurants, bars, etc., as most travelers do. On an overseas trip I sometimes would collect 20 or 30 books or boxes from different countries. These of course are all safety matches. Strike anywhere matches I don't think exist anymore. Sometimes I would carry them in my briefcase and sometimes in my checked luggage.

The airlines now tell me that safety matches are considered by the FAA as a "dangerous material". From what they sent me matchbooks are lumped in with all sorts of things that can explode. I'm sure you are aware that it is impossible for a safety match to ignite by itself or rubbing it on any surface other than the strike surface to obtain the other chemical. Therefore I am at a loss to understand why there is such an antiquated regulation still on the books, that was probably written for the strike anywhere matches.

Perhaps you are aware that the post office in their "Hazardous Matter" regulation (C023.3.5) permits mailing up to 50 pounds of matchbooks. Now of course most of the mail goes by air, which is a bit confusing. I belong to three matchbook clubs and we trade back and forth by mail all the time, and these packages undoubtedly were transported by air.

Has any thought been given to bringing the FAA regulation up to date? Would appreciate hearing from you.

Sincerely,

Handwritten signature:
Robert C. Franz