



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

APR 19 2000

Mr. William Porter
Textron Systems Corporation
201 Lowell Street
Wilmington, MA 01887-2941

Ref. No. 00-0056

Dear Mr. Porter:

This is in response to your letter dated February 17, 2000, regarding the segregation requirements for Class 1 (explosive) materials on a transport vehicle under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180).

You asked whether explosives products, "Gas Generator, 1.4C", "Gas Generator/Initiator, 1.4G", and "Smoke Sublet, 1.4B", having a total weight of no more than 18 grams per shipment, may be transported on the same motor vehicle. If not, how can such explosives be transported on the same motor vehicle and not be in violation of the regulations?

The explosives described as "Gas Generator, 1.4C", "Gas Generator/Initiator, 1.4G" and "Smoke Sublet, 1.4B" may not be loaded or transported together, except as provided in the "Compatibility Table for Class 1 (Explosive) Materials", in § 177.848(f), which, depending on the combination of explosives and their compatibility groups, may require use of separate vehicles.

Except for fireworks and explosive articles requiring special stowage, and provided no explosive substances are carried in the same motor vehicle, explosive articles in compatibility group "G" may be transported in the same motor vehicle with explosive articles in compatibility group "C" (§ 177.848(f)(3)(vi)). An explosive substance is a material which meets the definition of an explosive as defined by Subpart C of Part 173 of the HMR, and is designed to produce a practical effect by explosion. An explosive article is a device containing an explosive substance, such as a detonator or a cartridge for weapons.



000056

177.848

You may wish to apply for an exemption from the regulations. The requirements for applying for an exemption are found in § 107.105.

I hope this satisfies your inquiry. If we can be of further assistance, please contact us.

Sincerely,

A handwritten signature in cursive script, appearing to read "Delmer F. Billings".

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

TEXTRON Systems Division

Textron Systems Division/
Subsidiary of Textron Inc.

201 Lowell Street
Wilmington, MA 01887-2941

To: Office of Hazardous Materials Transportation
Research and Special Programs Administration
Attn: Edward Mazzullo
Phone: 202-366-4488
Telecopier: 202-366-3012

From: William Porter PSHT/Explosive Safety Engineer
Mailstop: 3213
Phone: 978-657-1278
Telecopier: 978-657-2391

Date: February 17, 2000

Subject: Transportation of Explosives Wide Area Munitions (WAM)

Reference: CFR 49, PARA(s) 177.848, Compatibility Table for Class 1
(Explosive) Material

Background:

- Textron Systems Corporation (TSC) is a defense contractor (building/testing/explosive products) for USA/USN/USAF.
- TSC must transport the following munition components from Wilmington, Massachusetts to Ft. Devens, Massachusetts (10 miles)

Product Name	Part No.	Explosive Material	Hazardous Class	COE/REF NR
Gas Generator	12908056	BKNO3/propellant /M-36/7.34g	1.4C	EX-9105240
Gas Generator/Initiator	12908055	ZPP*/.130g	1.4G	EX-9105239
Smoke Sublet	19386382	EO100044-1**/ZPP/.189g	1.4B	EX-9808210

* Zirconium potassium perchlorate

** Mixture(s) plus ZPP

- All products are packaged /labeled per CFR 49 and are being transported in three (3) separate vehicles.

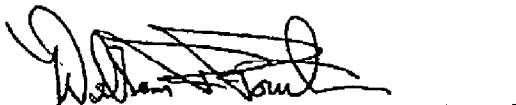
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Request Your Assistance

1. Do we really need three (3) vehicles to transport Class 1.4 explosives?
2. We are presently only transporting one (1) or two (2) of these items with a total explosive weight of no more than 18g per shipment.
3. Do you know of anyway we can legally transport the above products together?
4. In our review of Compatibility Table (reference) for Class 1, we noted that compatibility Group G is compatible with C per Item 6. Is this true?

If additional information is required, please feel free to contact me at 978-657-1278 or fax at 978-657-2391.

Thank you for your assistance in this matter.



William Porter
PHST/Safety