



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

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

FEB 20 2001

Ms. Jackie Brian  
Materials Manager  
HITECH  
P.O. Box 3112  
East Camden, AR 71711

Ref. No. 00-0328

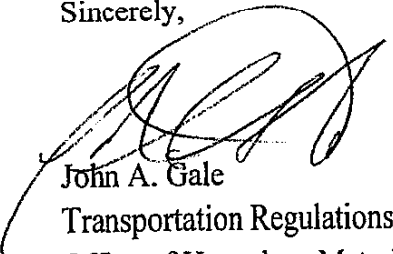
Dear Ms. Brian:

This responds to your November 3, 2000 letter requesting clarification pertaining to the instructions for using the compatibility table for Class 1 explosive materials under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask for a clarification of § 177.848(g)(3)(vi) regarding explosive articles in compatibility group G, being loaded with explosive articles in compatibility groups C, D and E.

Your understanding is correct. Section 177.848(g)(3)(vi) permits you to transport explosive articles in compatibility group G with explosive articles in compatibility groups C, D, and E, provided the compatibility group G articles are not fireworks or those requiring special stowage and further provided that no explosive substances are carried on the same vehicle. 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. In the examples you provide in your letter, you may load a truck with a combination of Rocket Motors, UN 0186, 1.3C and Ammunition Smoke, UN 0015, 1.2G. However, you may not load a truck with a combination of Ammunition Smoke, UN 0015, 1.2G and Hexolite, UN 0118, 1.1D.

I hope this answers your inquiry.

Sincerely,



John A. Gale

Transportation Regulations Specialist  
Office of Hazardous Materials Standards



000328



Booth  
§ 177.848 (g)  
Compatibility

A PRIMEX TECHNOLOGIES COMPANY

November 3, 2000  
JWB35300

Ref. No. 00-0328

U.S. Department of Transportation  
Attn.: DHM10  
Edward Mazzulo  
400 7<sup>th</sup> Street, SW  
Washington, D.C. 20590-0001

Subject: DOT Rule Clarification (177.848)

Dear Edward,

I am writing this letter to request clarification pertaining to (49 CFR 177.848 (g)) instructions for using compatibility table for Class 1 materials.

177.848 (g) (vi) makes reference to explosive articles from compatibility group G, being loaded with explosive articles from capability group C, D and E, provided no explosive substances are carried on the same vehicle.

My interpretation of this is, (A) The definition of an explosive article would be, example Rocket Motors UN0186, 1.3C, Rockets UN0181, 1.1E, Ammunition Smoke UN0015, 1.2G or 0016, 1.3G. (B) The definition of explosive substance would be, example Pentolite UN0151, 1.1D, Hexolite UN0118, 1.1D, Cyclotetramethylenetetranitramine UN0483 or 0484, 1.1D. The following is an example of what I think 49 CFR, 177.848 (g) (vi) allows. It would be allowed by the regulations to load a truck with a combination of Rocket Motors UN0186, 1.3C and Ammunition Smoke UN0015, 1.2G. It would not be allowed by the regulations to load a truck with a combination of Ammunition Smoke UN0015, 1.2G and Hexolite UN0118, 1.1D.

I appreciate your time in helping me reach a conclusion to this matter. If you have any question pertaining to this letter, I can be reached phone, fax or e-mail. The numbers and address are on the attached business card.

Thank you,

A handwritten signature in cursive script that reads "Jackie Brian".

Jackie Brian  
Materials Manager

JWB/sr