



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

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

OCT 30 2001

Ref. No: 01-0280

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

Dear Mr. Frerichs:

This is in response to your October 2, 2001 letter requesting clarification of segregation requirements for explosives under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically you ask whether a dromedary unit that is attached to the cab of a tractor trailer unit is considered a separate transport vehicle from the trailer. You intend to transport incompatible explosives separated in this manner.

The answer is yes. A dromedary unit that is attached to the cab of a tractor trailer unit where incompatible explosives are transported with one group in the dromedary unit and one group on the trailer is acceptable for hazardous materials that may not be transported on the same transport vehicle.

I hope this information is helpful.

Sincerely,

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



010280



REPLY TO  
ATTENTION OF

DEPARTMENT OF THE ARMY  
US ARMY DEFENSE AMMUNITION CENTER  
1 C TREE ROAD  
MCALESTER, OK 74501-9053  
October 2, 2001

LaValle  
§177.848  
Segregation  
01-0290

SMAAC-DE

Mr. Edward Mazzullo  
Director  
Office of Hazardous Materials Standards  
400 7<sup>th</sup> Street SW  
Washington, DC 20590

Dear Mr. Mazzullo:

This office was tasked to design a DROM Box that could be directly attached to the Heavy Expanded Mobility Tactical Truck with Load Handling System (HEMTT-LHS). The Interim Brigade Combat Team (IBCT) in Fort Lewis, WA intends to use the box to store and transport a small amount of fuzes or signal/smoke devices. The box is separate from the demountable HEMTT-LHS flatrack. Enclosed (attachment 1) is a detailed description of the DROM box and the HEMTT-LHS truck.

The IBCT HEMTT-LHS vehicles are loaded at Fort Lewis, WA and travel over public highways to reach the training site in Yakima, WA. The DROM box would allow the IBCT to carry all required training items on the HEMTT-LHS vehicle. This would eliminate the need for additional transportation vehicles to carry the required small amount of fuzes or signal/smoke devices.

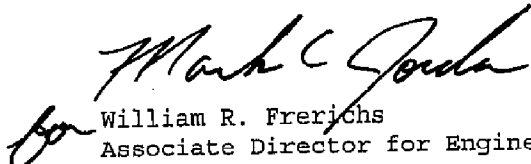
This office has reviewed the DROM Box concept and concluded that the concept is in compliance with 49 CFR, section 177.848, Segregation of Hazardous Materials. The incompatible items are on separate transport vehicles. The DROM box is stored directly on the HEMTT-LHS and the demountable flatrack with cargo is offloaded to the ground and the HEMTT-LHS with DROM box containing the incompatible items drives away.

The IBCT HEMTT-LHS is identical to a semi-truck storing incompatible items in a dromedary behind the cab. The semi-truck is allowed to do this based on the fact it can unhitch from the semi-trailer and drive away with the incompatible items (two cargo carrying bodies).

We request that your office concur with our interpretation of 49 CFR, section 177.848, Segregation of Hazardous Materials. We request that your office provide your concurrence or reasons for non-concurrence to this office by 2 NOV 2001.

Point of contact is Mr. Michael Bartosiak, SMAAC-DET, commercial telephone number (918) 420-8083.

Sincerely,

  
for William R. Frerichs  
Associate Director for Engineering

Enclosure