



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

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

OCT 28 2005

Mr. P.A. Cooley, MSTC
U.S. Coast Guard
End of State RT 238
Yorktown, VA 23690-5000

Ref. No. 05-0203

Dear Mr. Cooley:

This responds to your August 26, 2005 memorandum requesting clarification on the definition of "fore and aft" and "athwartships" regarding section § 176.83(f)(4) of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you request the definition of these terms in the context of general container segregation under § 176.83(f)(4).

"Fore and aft" and "athwartships" are common nautical terms. In the context of 49 CFR 176.83(f)(4), "fore and aft" means a container space of not less than 6 m (20 feet) long or "athwartships" means a container space of not less than 2.5 m (8 feet) wide when the container is in parallel (bow to stern) with the keel.

In the context of the diagram ("separated from".2 from chapter 7.2 of the International Maritime Dangerous Goods (IMDG) Code) that accompanied your memo, "fore and aft" means one container space in the direction parallel with the keel (bow to stern) and "athwartships" means one container space perpendicular to the keel (port to starboard) when the container is aligned in parallel to the keel. Two closed incompatible containers are permitted to be segregated by one bay and two rows, as described in your memo, because the containers are one container space, 2.5 m (8 feet) apart in the athwartships (port to starboard) direction.

I hope this answers your inquiry.

Sincerely,

John A. Gale
Chief, Standards Development
Office of Hazardous Materials



050203

171.8
176.83(f)(4)

U.S. Department of
Homeland Security

United States
Coast Guard



Commanding Officer
US Coast Guard Training Center

Boothe
@ 171.8
§ 176.83(f)(4)
Segregation/Definitions
05-0203

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16616
26 Aug 2005

MEMORANDUM

From: *[Signature]* P. A. COOLEY, MSTC, USCG

Reply to
Attn of: P. A. COOLEY, MSTC,
USCG
3202

To: OFFICE OF HAZARDOUS MATERIALS SAFETY
Subj: GUIDANCE REGARDING "FORE AND AFT" AND "ATHWARTSHIPS" IN
REFERENCE TO CONTAINER SEGREGATION
Ref: (a) 49 Code of Federal Regulations Parts 100 to 185

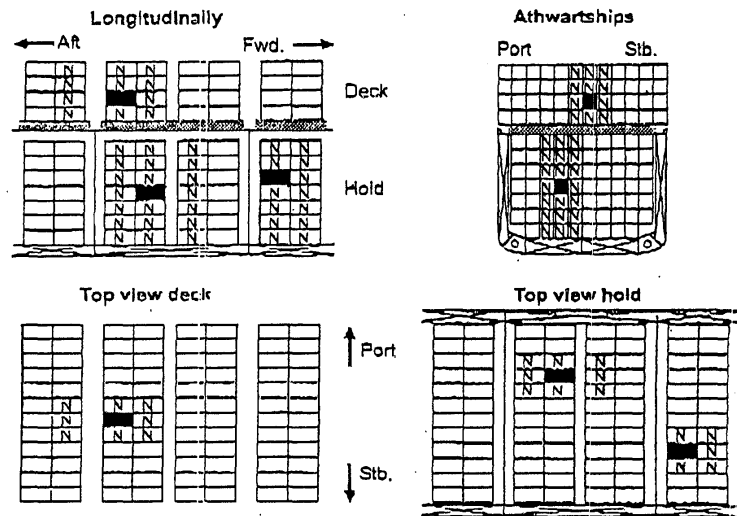
1. As per 49 CFR 105.20, I am requesting guidance for the following situation:
 - a. 49 CFR 176.83(f)(4) states that a container space means a distance of not less than 6m fore and aft or not less than 2.5m athwartship.
 - b. 49 CFR 176 does not define "fore and aft" or "athwartships".
 - c. In instances when a container is located one bay and two rows away from another, see ENCLOSURE 1 for a diagram, does the "fore and aft" container space (6m), or the "athwartships" container space (2.5m) apply in regards to segregation of 2, "Separated from"?
2. Any guidance or definition would be appreciated.

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Enclosures: (1) IMDG Code (AMDT. 30-00) page337, Diagram of vessel showing segregation of 2, closed versus closed situation

Chapter 7.2 - Segregation

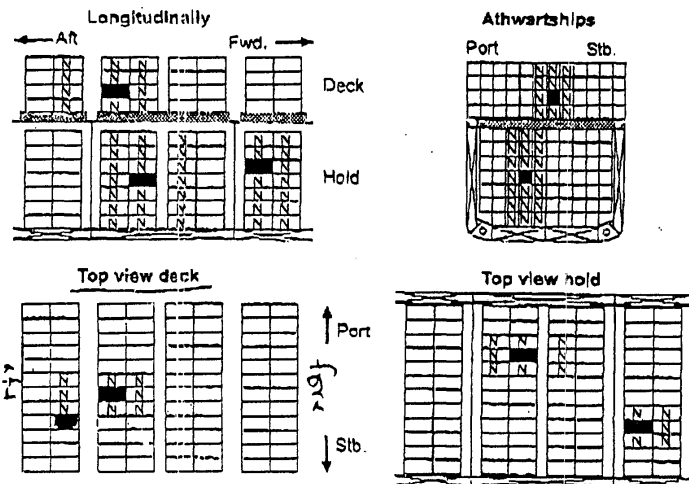
"AWAY FROM" .1			
OPEN VERSUS OPEN	HORIZONTAL		VERTICAL
	ON DECK	UNDER DECK	
FORE AND AFT	One container space	One container space or one bulkhead	NOT in the same vertical line unless segregated by a deck
ATHWARTSHIPS	One container space	One container space	



1 - Situation open versus open

Note: All bulkheads and decks should be resistant to fire and liquids.

"SEPARATED FROM" .2			
CLOSED VERSUS CLOSED	HORIZONTAL		VERTICAL
	ON DECK	UNDER DECK	
FORE AND AFT	One container space	One container space or one bulkhead	NOT in the same vertical line unless segregated by a deck
ATHWARTSHIPS	One container space	One container space	



2 - Situation closed versus closed

Note: All bulkheads and decks should be resistant to fire and liquids.

Specific situation - refer to the two blacked spots segregate for fire aft or athwartships?

ENCLOSURE (1)