



U.S. Department
of Transportation

Pipeline and Hazardous Materials
Safety Administration

1200 New Jersey Ave., SE
Washington, DC 20590

NOV 17 2008

Ms. Gretchen Schmidt
Bluegrass Army Depot
431 Battlefield Memorial Highway
Richmond, KY 40475-5070

Reference No. 08-0119

Dear Ms. Schmidt:

This is in response to your e-mail asking whether materials with the proper shipping name "Fuzes, detonating," fall under the category of "detonators" and are subject to the requirements prescribed in § 177.835(g) of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). We apologize for the delay in responding and any inconvenience this may have caused.

The answer is yes. The HMR defines a "detonator" in § 173.159 as an article that is designed to start a detonation train of an explosive material, and a "fuze" as an article designed to start a detonation or deflagration in ammunition that incorporates mechanical, electrical, chemical, or hydrostatic components and generally protective features. The HMR list all detonating fuzes by identification number under § 173.61(c), including UN 0106, UN 0107, UN 0257, and UN 0367 for "Fuzes, detonating," and UN 0408, UN 0409, and UN 0410 for "Fuzes, detonating *with protective features*." The list also includes UN numbers for detonators that are listed in the United Nations Recommendations on the Transport of Dangerous Goods, the International Civil Aviation Organizations (ICAO's) Technical Instructions for the Safe Transport of Dangerous Goods by Air (Technical Instructions), and the International Maritime Dangerous Goods (IMDG) Code.

Section 173.61 prescribes requirements for packaging explosives with other materials. Paragraph (c) of this section prohibits detonators from being packed with other Class 1 materials except other detonators that meet the compatibility requirements prescribed in § 173.61(e). In addition, § 177.835(g) prohibits detonators from being transported on the

same motor vehicle with any Division 1.1, 1.2, or 1.3 explosive material (except other detonators, detonator assemblies, or boosters with detonators), Division 1.4 detonating cord, or Division 1.5 material unless the detonating materials are placed in protective packagings prescribed in § 177.835(g)(1), (g)(2), or (g)(3).

I hope this satisfies your request.

Sincerely,

A handwritten signature in black ink, appearing to read "Hattie L. Mitchell", with a long horizontal flourish extending to the right.

Hattie L. Mitchell
Chief, Regulatory Review and Reinvention
Office of Hazardous Materials Standards

Drakeford, Carolyn <PHMSA>

From: INFOCNTR <PHMSA>
Sent: Wednesday, April 30, 2008 1:31 PM
To: Drakeford, Carolyn <PHMSA>
Subject: FW: Information Center Comments/Questions

Edmonson
§177.835 (g)
Highway
08-0179

Carolyn,
This woman would like a written letter of interpretation on the issue discussed below.
Thanks Rob

-----Original Message-----

From: gretchen.schmidt@us.army.mil [mailto:gretchen.schmidt@us.army.mil]
Sent: Wednesday, April 30, 2008 11:49 AM
To: INFOCNTR <PHMSA>
Subject: Information Center Comments/Questions

Below is the result of your feedback form. It was submitted by Gretchen Schmidt (gretchen.schmidt@us.army.mil) on Wednesday, April 30, 2008 at 11:48:33.

Email: gretchen.schmidt@us.army.mil
Name: Gretchen Schmidt
Category: Highway (Sections 177.800 - 177.870)
Organization: Bluegrass Army Depot
Street: 431 Battlefield Memorial Hwy.
City: Richmond
State: Kentucky
Zip Code: 40475-5070
Phone: 859-779-6826

Comments: I am asking a question in regard to 177.835(g), the section about detonators. I would like to know which proper shipping names this applies to, specifically, if the PSN: FUZES, DETONATING falls in the categories described in this paragraph. I would appreciate a written reponse. Thankyou for your time.

Gretchen Schmidt