



U.S. Department  
of Transportation

Pipeline and Hazardous Materials  
Safety Administration

1200 New Jersey Ave., SE  
Washington, DC 20590

DEC 03 2009

Mr. Alex Henderson  
Ocean Transport Manager  
Safcomar, Inc.  
75 Montgomery Street, Suite 301  
Jersey City, NJ 07302

Reference No. 09-0252

Dear Mr. Henderson:

This is in response to your October 26, 2009 letter concerning the requirements for segregating hazardous materials on a motor vehicle under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). You ask if the HMR prohibit all Division 6.1 (poisonous) materials from being loaded on the same motor vehicle with a Class 3 flammable liquid or only those that are liquid and meet the definition of Packing Group (PG) I, Hazard Zone A, prescribed in § 173.133(a)(2).

The HMR prohibit only those Division 6.1 liquids that meet the definition of a Packing Group (PG) I, Hazard Zone A material from being loaded on the same motor vehicle with a Class 3 flammable liquid. Unless an exception exists elsewhere in the HMR, hazardous materials transported by motor vehicle must be stored, loaded, or transported as specified in the "Segregation Table for Hazardous Materials" (Segregation Table) prescribed in § 177.848(d). The letter "X" appears in the entry on the Segregation Table for liquid, PG I, Hazard Zone A, Division 6.1 materials and Class 3 liquids, which indicates that these materials may not be loaded, transported, or stored together in the same transport vehicle or storage facility during the course of transportation. However, please note that materials classed as Division 6.1 PG I, Hazard Zone B, C, or D, or PG II or PG III have no restrictions with other hazardous materials, as pointed out in the instructions for using the Segregation Table (see § 177.848(e)), but may not be transported on the same vehicle with materials marked as or known to be foodstuffs, feed, or any other edible material intended for consumption by humans or animals. See § 177.841(e)(3).

I hope this satisfies your request.

Sincerely,

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



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Edmonson  
\$177,848.  
Segregation  
09-0252

Monday, October 26, 2009

Dar US DOT PHMS,

We were considering shipping two products together for road transportation however, we had a disagreement about the regulations and we felt that we should have your opinion on this before we proceeded.

Item #1: UN 2811 TOXIC SOLID, ORGANIC, N.O.S., {BENZOPYRROLE}, CLASS 6.1, PG III, 100 CC.

Item #2: UN 3272, ESTERS, N.O.S. (HEXENYLV ACETATE), CLASS 3, PG III, 57CC

The question is whether it is prohibited to combine all class 6.1 and class 3 or just Poisonous liquids PG I Zone A and class 3 and can these two shipments be combined together for road transport ?

Thank you for your time.

Sincerely,

Alex Henderson  
Ocean Transport Manager

DOT/RSPA/OHMS  
UNIT  
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