



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Ave., S.E.
Washington, DC 20590

Ms. Marie Easley-Cook
Safety Analyst Associate
Con-way Freight
2211 Old Earhart Road
Ann Arbor, MI 48105

SEP 15 2011

Ref. No.: 11-0166

Dear Ms. Easley-Cook:

This responds to your July 1, 2011 letter regarding the requirements under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171–180) applicable to the transportation of explosives. Your reference letter of interpretation number 08-0192 in which the Pipeline and Hazardous Materials Safety Administration (PHMSA) stated that “Division 1.4 materials (other than Division 1.4 detonating cord) may be transported on the same motor vehicle as detonators without meeting the conditions specified in paragraphs (g)(1) thru (g)(3) of § 177.848(g), provided they are authorized for such transportation in the compatibility table for Class 1 materials in § 177.848(f).” You present a scenario where UN 0440, Charges, Shaped, 1.4D are shipped with UN 0255, Detonators, Electric, 1.4B, in the same trailer. You ask if these two materials can be shipped together in transportation.

The materials you describe may only be transported on the same motor vehicle if the requirements of § 177.835(g)(1), (2), and (3) are met. The compatibility chart in § 177.848(f) generally does not allow 1.4D and 1.4B materials to be shipped on the same vehicle but references the reader to Note 4. Note 4 directs the reader to § 177.835(g) which prohibits the transportation of detonators on the same motor vehicle with any Division 1.1, 1.2, or 1.3 material (except other detonator assemblies, boosters with detonators or other detonators), explosives for blasting, or detonating cord Division 1.4 material.

I hope this satisfies your inquiry. Please contact us if we can be of further assistance.

Sincerely,

T. Glenn Foster
Chief, Regulatory Review and Reinvention Branch
Standards and Rulemaking Division

Andrews
3177.848
3177.835
Explosives
11-0166

July 1, 2011

Mr. Charles E. Betts
Director, Office of Hazardous Materials Standards
U.S. DOT/PHMSA (PHH-10)
1200 New Jersey Avenue, SE East Building, 2nd Floor
Washington, DC 20590

Mr. Betts:

I am requesting clarification on a letter of interpretation dated April 1, 2010, Reference No. 08-0192, in regards to a shippers request for transportation of explosives. Paragraph three states "Division 1.4 materials (other than Division 1.4 detonating cord) may be transported on the same motor vehicle as detonators without meeting the conditions specified in paragraphs (g)(1) thru (g)(3) of 177.835(g) provided they are authorized for such transportation in the compatibility table for Class 1 materials in 177.848(f)".

The scenario that I present is the transportation of UN0440, Charges, Shaped, 1.4D, with UN0255, Detonators, Electric, 1.4B, in the same trailer.

Applying the passage from the aforementioned letter, the 1.4D (Charges, Shaped) material can be shipped with the 1.4B (Detonators, Electric), if the compatibility table authorizes it.

After checking the compatibility table for Class 1 (Explosive) materials in 177.848(f), an "X" is located where "B" and "D" meet. Therefore, following the instructions in 177.848(g)(2), "The letter "X" in the table indicates that explosives of different compatibility groups may not be carried on the same transport vehicle," these materials cannot be transported together.

Is this correct? Can these explosive materials be transported together?

Thank you for your assistance.

Regards,



Marie Easley-Cook
Safety Analyst Associate
Con-way Freight
2211 Old Earhart Road
Ann Arbor, MI 48105



U.S. Department of Transportation
**Pipeline and Hazardous Materials
Safety Administration**

1200 New Jersey Ave, S.E.
Washington, D.C. 20590

APR 01 2010

Ms. Shelly Espinoza
Titan Specialties, Ltd.
143 HCR 4361
Milford, Texas 76670

Ref. No. 08-0192

Dear Ms. Espinoza:

This responds to your e-mail request for clarification of the segregation requirements for explosives under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask whether a typographical error exists in the introductory text of § 177.835(g) with regard to the transportation of Division 1.4 explosive materials, other than Division 1.4 detonating cord, on the same transport vehicle as detonators (except other detonators, detonator assemblies or boosters with detonators). It is your understanding that because there is no comma between the words “detonating cord” and “Division 1.4 material” in both sentences of the introductory text where they appear, it inadvertently prohibits the transportation of Division 1.4 material, other than Division 1.4 detonating cord, on the same transport vehicle as detonators under the conditions specified in the remainder of the paragraph. I apologize for the delay in responding and any inconvenience it may have caused.

Your understanding is not correct. Section 177.835(g) establishes requirements for loading various types of explosive materials on the same transport vehicle. In accordance with this section, detonator assemblies or boosters may not be transported on the same motor vehicle as explosive material assigned to Division 1.1., 1.2, or 1.3; detonating cord that is assigned to Division 1.4; or explosive material assigned to Division 1.5. Division 1.4 materials (other than Division 1.4 detonating cord) may be transported on the same vehicle as detonator assemblies or boosters provided they are authorized for such transportation in the compatibility table for Class 1 materials in § 177.848(f).

Section 177.835(g) authorizes detonators to be transported on the same motor vehicle as explosive material assigned to Division 1.1., 1.2, or 1.3; detonating cord that is assigned to Division 1.4; or explosive material assigned to Division 1.5 under the conditions specified in paragraphs (g)(1) thru (g)(3). Division 1.4 materials (other than Division 1.4 detonating cord)

may be transported on the same motor vehicle as detonators without meeting the conditions specified in paragraphs (g)(1) thru (g)(3) of § 177.835(g) provided they are authorized for such transportation in the compatibility table for Class 1 materials in § 177.848(f).

I trust this satisfies your inquiry. Please contact us if we can be of further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Hattie L. Mitchell", written in a cursive style.

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