



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, D.C. 20590

AUG 11 2014

Mr. Lenny Shoval  
Marketing Dept.  
Israel Military Industries Ltd. (IMI)  
Small Caliber Ammunition Division  
P.O. Box 1044  
Ramat Hasharon  
47100 Israel

Ref. No. 13-0200

Dear Mr. Shoval:

This responds to your October 21, 2013 e-mail to our Approvals and Permits Division regarding the labeling of packages under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Your request was forwarded to this Office for a response. In your e-mail, you ask whether a Division 1.4S label with the text "Explosives" may be displayed on a package of small arms ammunition transported to or within the United States.

The answer is yes. Though the label you provide does not conform to the design requirements of the HMR, it is authorized by § 172.407(f). Section 172.407(f) authorizes, except for materials poisonous by inhalation, a label conforming to the United Nations Recommendations on the Transport of Dangerous Goods (UN Model Regulations). Further, it is the opinion of this Office that the label you provide in your letter would not be prohibited under 5.2.2.2.1.5 of the United Nations Model Regulations and may be displayed on a package of cartridges, small arms transported to, from or within the United States.

I trust this information is helpful. Please contact us if we can be of further assistance.

Sincerely,

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

**Drakeford, Carolyn (PHMSA)**

Stevens  
3173.101  
3173.59

**From:** Billings, Delmer (PHMSA)  
**Sent:** Thursday, October 24, 2013 4:25 PM  
**To:** Drakeford, Carolyn (PHMSA)  
**Cc:** Fink, William (PHMSA)  
**Subject:** FW: 1.4S Hazardous goods markings on IMI outer cartons  
**Attachments:** IMI carton markings.pdf; 1.4S orange label.pdf

Explosives

13-0200

Carolyn,

Please log in and assign to a special for response.

Thanks,  
Del

**From:** Fink, William (PHMSA)  
**Sent:** Thursday, October 24, 2013 9:48 AM  
**To:** Billings, Delmer (PHMSA)  
**Cc:** Singh, Harpreet (PHMSA); Betts, Charles (PHMSA)  
**Subject:** FW: 1.4S Hazardous goods markings on IMI outer cartons

Del,

Can Standards reply to Mr. Shoal, please.

TY  
Bill

**From:** Lenny Shoal [<mailto:lennys@imi-israel.com>]  
**Sent:** Monday, October 21, 2013 7:28 AM  
**To:** Fink, William (PHMSA)  
**Cc:** 'Leon Green'  
**Subject:** 1.4S Hazardous goods markings on IMI outer cartons

Dear Mr. Fink,

Attached please find two files with:

- (1) IMI drawing 017743-C showing the markings on the outer carton we use to ship 5.56mm cartridges (1.4S) to the US
- (2) the orange **"1.4 EXPLOSIVES S 1"** hazardous goods label that appears on the side of above outer carton drawing

We would appreciate your assistance in replying to our two inquiries below:

1. Is the IMI outer carton in drawing # 017743-C which includes on one of its flaps the attached square orange label marked **"1.4 Explosives S 1"**, suitable for the inland transport of small caliber ammunition within the United States ?
2. Is the attached square orange label sufficient for marking these goods as 1.4S hazardous goods and for transport within the US ?

We look forward to receiving your reply on this so that we can plan our packagings accordingly.

Best regards,

Lenny Shoval - Marketing Dept.  
Israel Military Industries Ltd. (IMI)  
Small Caliber Ammunition Division  
tel: +972 - 4 650 0758  
mobile: +972 - 52 367 8335  
fax: +972- 4 656 0686



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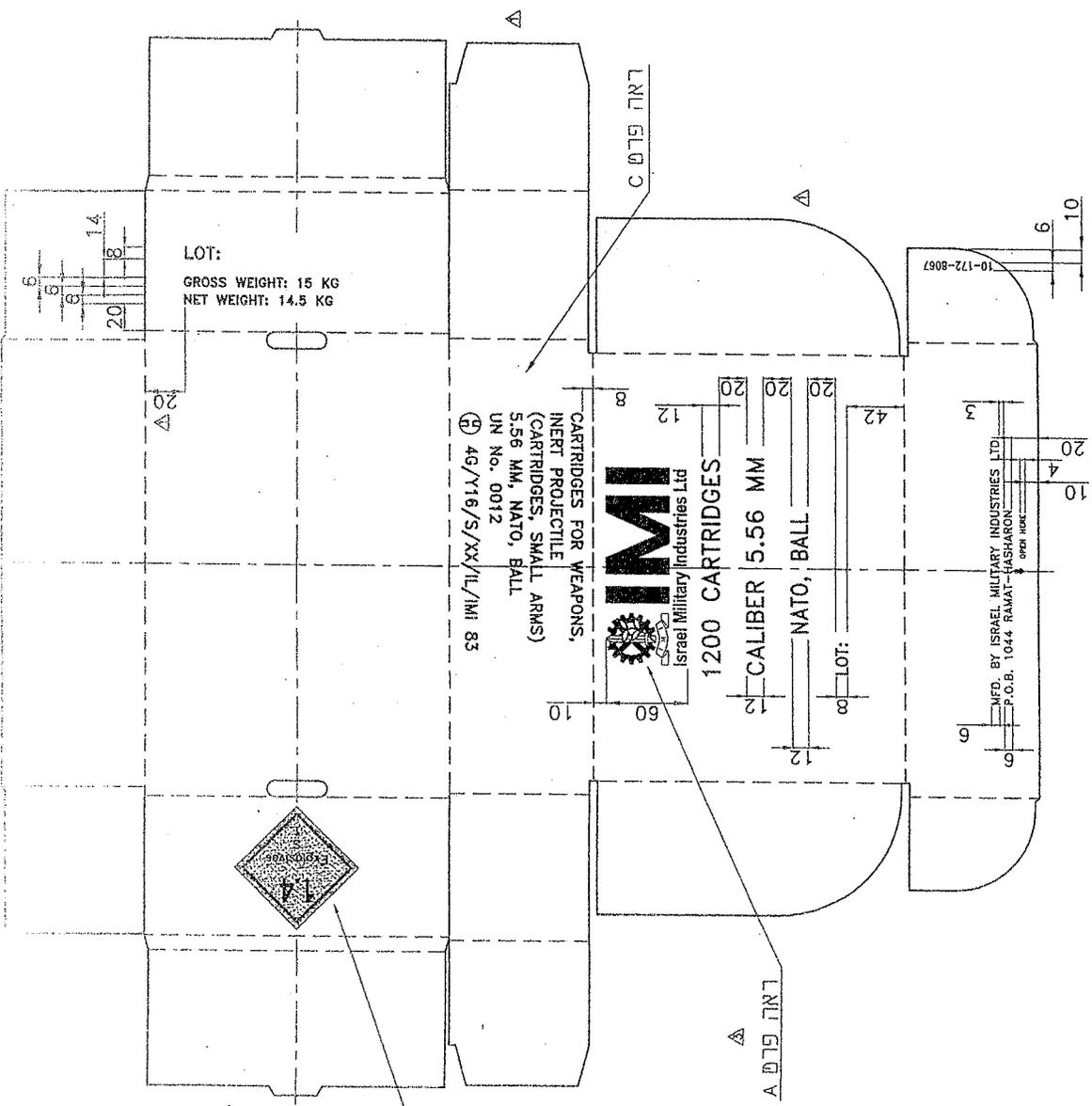
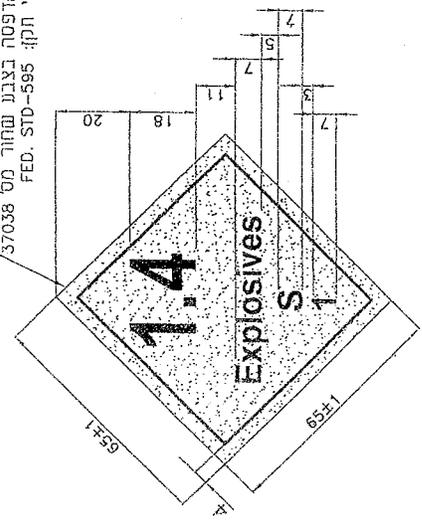
מסמך זה על כל תיקו ומכיליו הנו רכושם הבלעדי של התעשייה הצבאית לישראל. תעשה שומרה לפצמה את כלל החובות כמסמך זה. כל תיקו ומכילו ימכרו בנפרד או ימכרו יחדיו. רצו הסווגרים בו את תעשיית המל"ח בישראל או במדינה אחרת. כל תיקו ומכילו ימכרו בנפרד או ימכרו יחדיו. כל תיקו ומכילו ימכרו בנפרד או ימכרו יחדיו. כל תיקו ומכילו ימכרו בנפרד או ימכרו יחדיו.



פרט B  
ק.מ. 1.1

יש למרכז את הדפסת האזהרה על הקופסא

יצר ע"י רמת השרון כחונן לפי תקן:  
RAL 840 NR 2003  
הדפוסה בצבע שחור מס' 37038  
לפי תקן: FED. STD-595



פרט C  
מ"מ 8 רווח בין השורות 7 מ"מ

4G/Y16/S/XX/IL/IMI 83

במקום זה יש לסמן את שנת ייצור של הקופסה בנטי. ספרות האחרונות.

מס' חומר					
8067	8067	8067	8067	8067	8067
3-C	3-C	3-C	3-C	3-C	3-C
586-C	586-C	586-C	586-C	586-C	586-C

