



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

1200 New Jersey Avenue, SE
Washington, DC 20590

MAR 13 2015

Mr. Larry Nielsen
Safety and Compliance Manager
Pioneer Tank Lines, Inc.
12501 Hudson Road South
Afton, MN 55001

Reference No. 14-0190

Dear Mr. Nielsen:

This is in response to your October 6, 2014 email and subsequent telephone conversations with a member of my staff requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) relating to segregation requirements for highway transportation. Specifically, you ask if UN 1017 Chlorine must be segregated from other Class 8 (corrosive) liquids for highway transportation.

Chlorine is not prohibited from being transported in the same transport vehicle as Class 8 materials provided the separation requirements in § 177.848(e)(3) are complied with. These materials may not be loaded, transported, or stored together in the same transport vehicle or storage facility during the course of transportation unless separated in a manner that, in the event of leakage from packages under conditions normally incident to transportation, commingling of hazardous materials would not occur.

In your incoming request you note that the second half of § 177.848(e)(3) states "Notwithstanding the methods of separation employed, Class 8 (corrosive) liquids may not be loaded above or adjacent to Class 4 (flammable) or Class 5 (oxidizing) materials; except that shippers may load truckload shipments of such materials together when it is known that the mixture of contents would not cause a fire or a dangerous evolution of heat or gas." You ask if this exception would apply to a load containing UN 1017 Chlorine and a Class 8 liquid material. As UN 1017 Chlorine is a Division 2.3 (Zone B) material, this exception does not apply.

I trust this information is helpful. If you have further questions, please do not hesitate to contact this office.

Sincerely,

Duane A. Pfund
International Standards Coordinator
Standards and Rulemaking Division

Weld
\$177,848
Segregation
14-0190

Dodd, Alice (PHMSA)

From: Ciccarone, Michael CTR (PHMSA)
Sent: Tuesday, October 07, 2014 2:47 PM
To: Hazmat Interps
Subject: FW: Clarification of Interpretation 08-0143

Shante and Alice,

Please submit this for a formal letter of interpretation. Mr. Nielsen spoke to Adam Lucas and Shelby Geller in the HMIC.

His company address is:

12501 Hudson Road South
Afton, MN 55001-9751

Thanks,

Mike

From: larry [<mailto:larryn@pioneertanklines.com>]
Sent: Monday, October 06, 2014 4:43 PM
To: INFOCNTR (PHMSA)
Subject: Clarification of Interpretation 08-0143

I am requesting further clarification of the referenced interpretation, specifically if Chlorine, UN 1017, Class 2.3, 8, 5.1 (POISON INHALATION HAZARD) must be segregated from Class 8 liquids.

The letter from the requestor states in part "3. In addition, we are under the impression that if the products do NOT create a hazardous condition when comingled, then the materials may be adjacent to each other, if the mixture would not cause a fire or a dangerous evolution of heat or gas, based upon 177.848.(e)(3) and Interpretation 03-0146."

177.848(e)(3) reads in part "Notwithstanding the methods of separation employed, Class 8 (corrosive) liquids may not be loaded above or adjacent to Class 4 (flammable) or Class 5 (oxidizing) material; except that shippers may load truckload shipments of such materials together when it is known that the mixture of contents would not cause a fire or a dangerous evolution of heat or gas".

It is my interpretation that this portion of 177.848(e)(3) applies ONLY to the segregation of Classes 4, 8, and 5 and would not apply to the separation or segregation of Class 2.3 from Class 8 or Class 5.1.

Please issue your clarification at your earliest convenience.

Thank you.

Larry Nielsen
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