



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

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

AUG 12 2009

Mr. Hank Baird  
General Manager  
AP Training, Inc.  
22815 Glenn Drive, Suite 101  
Sterling, VA 20164

Ref. No. 09-0147

Dear Mr. Baird:

This responds to your letter dated June 25, 2009, regarding shipping paper requirements under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask about the requirement applicable to Class 1 materials for the net explosive mass of the material or article. Your questions are paraphrased and answered as follows:

- Q1. Is the requirement in §172.202(a)(5)(i) to communicate on shipping papers the “net explosive mass” of a Class 1 material or article required for those articles offered for transportation by aircraft?
- A1. In accordance with § 172.202(a)(6), for transportation by aircraft, a shipping paper must indicate the total net mass of hazardous materials in a package, unless a gross mass is indicated in the Hazardous Materials Table (HMT) in § 172.101, in which case the gross mass per package must be shown. For Class I materials transported by aircraft, the shipping paper must include an indication of the net explosive mass of the material. For explosive articles, the net explosive mass may be expressed in terms of either the net mass of the article or the explosive materials contained in the article.
- Q2. Is it permissible to enter both the “net explosive mass” and the “gross mass” on the shipping paper for those explosive articles or devices offered for transportation by aircraft?
- A2. The HMR require only the “net explosive mass” to be entered on the shipping paper for explosive articles offered for transportation by aircraft. However, nothing in the

HMR prohibits the inclusion of both the net explosive mass of the material or article and the gross mass of the package on the shipping paper.

I hope this satisfies your inquiry. If we can be of further assistance, please contact us.

Sincerely yours,

A handwritten signature in black ink that reads "Charles E. Betts". The signature is written in a cursive style with a large, stylized initial "C" and "B".

Charles E. Betts  
Chief, Standards Development  
Office of Hazardous Materials Standards

**Drakeford, Carolyn (PHMSA)**

**From:** INFOCNTR (PHMSA)  
**Sent:** Thursday, June 25, 2009 9:11 AM  
**To:** Drakeford, Carolyn (PHMSA)  
**Subject:** FW: Letter of Interpretation Request

Engram  
 § 172.202(a)(5)(i)  
 Shipping Papers  
 09-0147

**From:** Hank Baird [mailto:hbaird@alltranspack.com]  
**Sent:** Thursday, June 25, 2009 8:54 AM  
**To:** PHMSA HM InfoCenter  
**Subject:** Letter of Interpretation Request

The following information is a request for a Letter of Interpretation from PHMSA.

For shipping paper requirements the Code of Federal Regulations Title 49 in 172.202(a)(5)(i) states: "**Except for transportation by aircraft**, the total quantity of hazardous materials covered by the description must be indicated...and must include an indication of the applicable unit of measurement... For Class 1 materials, the quantity must be the net explosive mass. For an explosive that is an article, such as Cartridges, small arms, the net explosive mass may be expressed in terms of the net mass of either the article or the explosive materials contained in the article"

Question #1: Is the allowance to communicate on shipping papers the net explosive mass in terms of the net mass of the article or the explosive materials contained in the article as stated in 172.202(a)(5)(i) also permitted for those articles offered for transport by **air transportation**?

Question #2: If the allowance to communicate on shipping papers the **net explosive mass** in terms of **the net mass of the article** or the **explosive materials contained in the article** is permitted for those articles offered for transport by air – is it permissible to enter BOTH quantities?

Kindest regards,

Hank Baird/General Manager

**AP Training, Inc.**  
 an AllTransPack, Inc. Company

(703) 858-5169  
 (703) 858-5175 fax  
[www.alltranspack.com](http://www.alltranspack.com)

22815 Leser Drive Suite 101  
 Sterling, Va 20164