



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue SE  
Washington, DC 20590

AUG - 5 2011

Mr. Rick Araniz  
Director of Operations  
Central & Western Area  
Boyle Transportation  
15 Riverhurst Road  
Billerica, MA 01821

Ref. No.: 11-0066

Dear Mr. Araniz:

This responds to your e-mail dated March 17, 2011, regarding the placarding exceptions for Division 1.4 explosives having different compatibility groups under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you asked, for an explosive described as "UN0012, Cartridges, small arms, 1.4S, PG II," if your understanding is correct that the gross weight of 1.4S explosives (that are not required to be labeled) should not be added to the gross weight of other 1.4 explosives in determining the applicability of 1,001 pound, Table II, placarding exception.

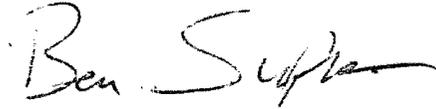
Your understanding is correct. In accordance with §172.504(f)(6), the EXPLOSIVE 1.4 placard is not required for those Division 1.4 Compatibility Group S (1.4S) materials that are not required to be labeled 1.4S. The Division 1.4S explosive label is not prescribed in "Column 6" of the §172.101 Hazardous Materials Table for the entry "UN0012, Cartridges, small arms, 1.4S, PG II." In the event of a mixed load of 1.4 explosives of differing Compatibility Groups, the amount of 1.4S materials using the exception in §172.504 (f)(6) are not required to be included in the aggregate gross weight determination prescribed in §172.504(c). As in your example, if a shipment contains 1,587 lbs of "UN0012, Cartridges, small arms, 1.4S, PG II" and 846 lbs of "UN0338, Cartridges, small arms, Blank, 1.4C, PG II", the shipment is not required to be placarded because the 1,587 lbs of 1.4S material is not required to be included in the aggregate gross weight referenced in §172.504(c).

For your information, under 49 C.F.R. § 173.63(b)(1), "[c]artridges, small arms and cartridges, power devices (which are used to project fastening devices) which have been classed as a

Division 1.4S explosive may be reclassified, offered for transportation, and transported as ORM-D material when packaged in accordance with [§173.63(b)(2)].” Such transportation is excepted from labeling and placarding.

I hope this information is helpful. If we can be of further assistance, please contact us.

Sincerely

A handwritten signature in black ink that reads "Ben Supko". The signature is written in a cursive style with a long horizontal flourish at the end.

Ben Supko  
Chief, Standards Development  
Standards and Rulemaking Division

Engram  
§ 172.504(c)  
Placarding

11-00 676

**Engram, Helen (PHMSA)**

**From:** Rick Araniz [Rick.Araniz@BOYLETRANSPORT.COM]  
**Sent:** Thursday, March 17, 2011 1:32 PM  
**To:** Engram, Helen (PHMSA)  
**Cc:** Operations; Steve Norbeck  
**Subject:** DoT Interpretation for mixed load Placarding requirements of Table II materials

U.S. DOT  
PHMSA Office of Hazardous Materials Standards  
Attn: PHH-10  
East Building  
1200 New Jersey Avenue, SE.  
Washington, DC 20590-0001

Ms. Helen Engram,

Thank you for taking my call today.

Our understanding of Table II placarding requirements is that gross weight of 1.4S materials that do not require labels and thus don't require placarding, (example UN 0012, Cartridges for weapons, inert projectiles) as described in 172.504(f)(6) should not be added to the gross weight of other 1.4 or Table II material when a mixed load occurs.

Example of the mixed load:

- Item 1: UN0012, Cartridges, Small Arms, 1.4S, PG II - gross weight 1,587 lbs.
- Item 2: UN0338, Cartridges, Small Arms, Blank, 1.4C, PG II - gross weight 846 lbs.

Please verify that this mixed load would NOT require placarding because it is under the 1,001 lb requirement for Table II material and thus qualifies for the exception found in 172.504(c).

Respectfully,  
Rick Araniz  
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