



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

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

SEP 27 2016

Mr. Stan Harrison
Team Leader
Williams International
Walled Lake Warehousing/Transportation
2280 East West Maple Road
Commerce Township, MI 48390

Reference No. 16-0023

Dear Mr. Harrison:

This letter is in response to your January 18, 2016, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the classification of an internal combustion engine with installed Class 1 components. Specifically, you state that the installed components are classed as two "UN0325, Igniter, 1.4G" and one "UN0275, Cartridge, Power Device Installed" and assigned the Department of Transportation (DOT) approval number EX-2005010294 and EX-2008010116, respectively. Your questions have been paraphrased and answered as follows:

- Q1. You ask if the basic description "UN3166, Engine, internal combustion, flammable liquid powered, Class 9" is appropriate and for confirmation that the engine with two installed igniters and one cartridge, power device would be eligible for the provisions of § 173.220(f)(1), as they are integral components of the engine and required for its operation.
- A1. Under § 173.56(i), the Associate Administrator for Hazardous Materials Safety may specify a classification or except an explosive material from the requirements of the HMR. In the scenario you described, the Associate Administrator has determined that a 1.4G igniter and a cartridge, power device that are integral parts of the combustion engine do not pose a hazard requiring an approval and may be excepted if the requirements of § 173.220(f)(1) are met. Provided the two 1.4G igniters and one cartridge, power device are integral and necessary for the operation of the engine in accordance with § 173.220(f)(1), the basic description "UN3166, Engine, internal combustion, flammable liquid powered, Class 9" would be appropriate. Please note that this opinion is limited to the facts you presented in your letter.
- Q2. You note that § 173.220(h)(1) exempts engines from placarding requirements when transported domestically by ground, and you request clarification on the required hazard communication for international air transport of this engine.

A2. The requirements for the transportation of engines can vary by mode. The modal exceptions are provided in § 173.220(b)(4).

Please note that this letter of interpretation is based on the information provided specific to the scenario in question and should not be construed as generally applicable.

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

Sincerely,

A handwritten signature in cursive script that reads "T. Glenn Foster". The signature is written in black ink and is positioned to the left of the typed name.

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

Goodall, Shante CTR (PHMSA)

Andrews

173-220
Class 9

16-0023

From: Geller, Shelby CTR (PHMSA)
Sent: Thursday, January 28, 2016 12:14 PM
To: Hazmat Interps
Subject: FW: Request for a Formal Letter of Interpretation with this configuration
Attachments: U.S DOT Letter of Interpretation.pdf; EX2008010116 FOR PN 72062.pdf; EX2005010294 FOR PN 77803.pdf

Dear Shante and Alice,

Forwarded is a request for a formal letter of interpretation. I spoke with Mr. Harrison about his request. There is a second interpretation request which only varies slightly from this request, which I will forward next. I spoke with Aaron and he mentioned that they can probably be written in the same letter.

Mr. Harrison's address is:
2280 East West Maple Road
Walled Lake Michigan, MI 48390

Thanks,
Shelby

From: SHarrison@williams-int.com [mailto:SHarrison@williams-int.com]
Sent: Monday, January 18, 2016 10:20 AM
To: INFOCNTR (PHMSA)
Cc: SHarrison@williams-int.com
Subject: Request for a Formal Letter of Interpretation with this configuration

Hello,

This is to obtain a Formal Letter of Interpretation for the classification of a shipment of a UN3166 Engine, Internal Combustion, Flammable liquid Powered with two UN0325 1.4G Igniter and a UN0275 1.3C Cartridge, Power Device installed.

Please help with providing information for this domestic shipment.

Shipment:

UN3166 Class 9 Engine, internal combustion, flammable liquid powered. On this engine is fixed and installed, grounded and shielded two UN0325, Igniter 1.4G (REFERENCE NUMBER EX2005010294) and a UN0275, Cartridge, Power Device (REFERENCE NUMBER EX2008010116) these are fixed components required for the operation of the engine.

Per **49 CFR 173.220(h)(1)**, Internal Combustion Engines are not subject to the Hazardous Materials Regulations, including placarding rules, when shipped by ground in the US and prepared in accordance with 49 CFR 173.220.

With respect to the Igniter and Cartridge, Power Device, see **49 CFR 173.220(f)(1)**:

"Items containing hazardous materials... that are integral components of the motor vehicle, engine, or mechanical equipment and are necessary for the operation of the vehicle, engine, or mechanical equipment.. must be securely installed in the motor vehicle, engine, or mechanical equipment. **Such items are not otherwise subject to the requirements of this subchapter.**"

The Two Igniter and One Cartridge, Power Device will be securely installed to the engine. The two Igniters will have Protective Fraday Cap-Shorting Device installed to provide a ground path from all connector contacts to ground to prevent actuation from High Energy Frequency Fields and Electrostatic Discharge while in storage or transporting. The Cartridge will have a Shunt between the wires preventing any connections and a Shielding Cap attached for storage or transporting, these protective devices will not be removed until the engine is installed on vehicle.

Per IATA UN3166 Packing instruction 950(d)(1)(2): Other operational equipment
These dangerous good UN0325, Igniter 1.4G and UN0275, Cartridge, Power Device would not be required to be reported on the Dangerous Goods Documents and this shipment would be shipped as a UN3166 Class 9 Engine, Internal Combustion, Flammable Liquid Powered.

In light of the above information please advise if this shipment can be made using UN3166 Engine, Internal Combustion, Flammable Liquid Powered,9? Please see attachments for additional information.

Thank you in advance for help!!!!

Stan Harrison
Team Leader
Walled Lake Warehousing\Transportation
Williams International
Phone: (248)960-2472
E-mail: sharrison@williams-int.com

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U.S. Department
of Transportation

Pipeline and Hazardous
Materials Safety Administration

The US Department of Transportation
Competent Authority for the United States

East Building, PHH - 32
1200 New Jersey Avenue, Southeast
Washington, D.C. 20590

CLASSIFICATION OF EXPLOSIVES

Based upon a request by Pacific Scientific, 3601 Union Road, Hollister, CA, the following items are classed in accordance with Section 173.56, Title 49, Code of Federal Regulations (49 CFR). A copy of your application, all supporting documentation and a copy of this approval must be retained and made available to DOT upon request.

U.N. PROPER SHIPPING NAME AND NUMBER:

Cartridges, power device, UN0275

U.N. CLASSIFICATION CODE: 1.3C

REFERENCE NUMBER

EX2008010116

PRODUCT DESIGNATION/PART NUMBER

P/N 829000-01

DATED: February 15, 2008

Approved by:

Theodore L. Wilke
for Theodore L. Wilke
Associate Administrator
for Hazardous Materials Safety



U.S. Department
of Transportation

Pipeline and Hazardous
Materials Safety
Administration

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

NOV 13 2014

Stan Harrison
Team Leader
Williams International
Walled Lake Warehousing/Transportation
2280 E. West Maple Road
Commerce Township, MI 48390

Ref. No.: 14-0071

Dear Mr. Harrison:

This is in response to your letter dated April 2, 2014 requesting clarification of the Hazardous Material Regulations (HMR; 49 CFR Parts 171-180) applicable to the classification of an engine with an installed Class 1 component. The installed component is classed as "UN0325, Igniter, 1.4G" and assigned the Department of Transportation (DOT) approval number EX-2005010294. Specifically, you ask if the basic description "UN3166, Engine, internal combustion, flammable liquid powered, Class 9" is appropriate and ask for confirmation that the engine with installed igniter would be eligible for the provisions of § 173.220(f)(1) as the igniter is both an integral component of the engine and required for operation of the engine. In addition, you note that § 173.220(h)(1) exempts engines from placarding requirements when transported domestically by ground and request clarification on the required hazard communication for international air transport of this engine.

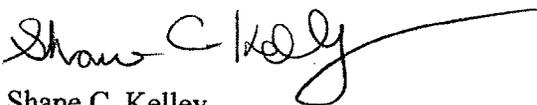
Under § 173.56(i) of the HMR, the Associate Administrator for Hazardous Materials Safety may specify a classification or except an explosive material from the requirements of the HMR. In the scenario described, the AA has determined that a 1.4G igniter that is an integral part of the combustion engine does not pose a hazard requiring an approval and may be excepted if the requirements of § 173.220(f)(1) are met. Provided the 1.4G igniter is an integral component of the engine and necessary for the operation of the engine in accordance with § 173.220(f)(1), the basic description "UN3166, Engine, internal combustion, flammable liquid powered, Class 9" would be appropriate. This decision is limited to the facts you presented in your letter.

The requirements of the HMR apply to all modes of transportation. For domestic transportation to the airport of departure by motor vehicle or rail car, provided the fuel tank is securely closed, the engine is not subject to any other requirements under the HMR (e.g., shipping papers, labeling, marking, placarding, or emergency response information). Subpart C of Part 171, authorizes the use of the ICAO Technical Instructions for the Safe Transport of Dangerous Goods by Air (TI) if any portion of the transportation is by aircraft. Under the ICAO TI, Packing Instruction 950 provides that dangerous goods required for the operation

of the vehicle, machine, or equipment must be securely mounted to the vehicle, machine, or equipment, and in addition requires that dangerous goods identified in Table 3-1 as forbidden on passenger aircraft, only be transported on cargo aircraft. Special Provision A87 excepts articles, which are not fully enclosed by packaging, crates or other means that prevent ready identification, from the marking requirements of 5;2 and the labeling requirements of 5;3.

Please note that this letter of interpretation is based on the information provided specific to the scenario in question and should not be construed to be generally applicable. I hope this information is helpful. If you have further questions, please do not hesitate to contact this office.

Sincerely,

A handwritten signature in black ink, appearing to read "Shane C. Kelley", with a long horizontal flourish extending to the right.

Shane C. Kelley
Acting International Standards Coordinator
Standards and Rulemaking Division



U.S. Department
of Transportation

400 Seventh Street, S.W.
Washington, D.C. 20590

**Research and
Special Programs
Administration**

The US Department of Transportation
Competent Authority for the United States

CLASSIFICATION OF EXPLOSIVES

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U.N. PROPER SHIPPING NAME AND NUMBER:

Igniters, UN0325

U.N. CLASSIFICATION CODE: 1.4G

REFERENCE NUMBER

EX2005010294

PRODUCT DESIGNATION/PART NUMBER

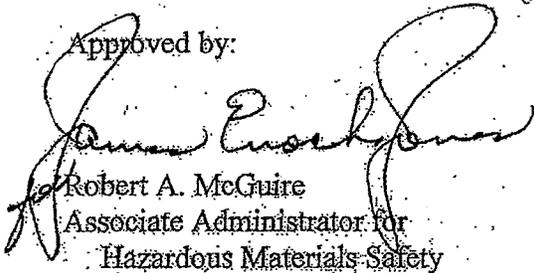
15936-05

NOTES:

The following packaging method is assigned: Inner Packaging - Bag, foil, each containing one igniter pre-wrapped in plastic bubble wrap. Outer Packaging - UN 4G fiberboard box, each containing not more than fifty (50) inner packagings.

DATED: January 26, 2005

Approved by:



Robert A. McGuire
Associate Administrator for
Hazardous Materials Safety