



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, DC 20590

SEP 29 2017

Timothy W. Kenney  
Valley View Industries, Inc.  
8785 E 2500 North Road  
Cornell, IL 61319

Reference No. 16-0202

Dear Mr. Kenney:

This letter is in response to your December 15, 2016, email and our subsequent phone conversation with your colleague requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the transportation of Class 1 material on a multipurpose bulk truck (MBT). Specifically, you indicate that you transport "UN0332, Explosive blasting, type E, 1.5D" and ask if the HMR allows for the transportation of "UN0042, Boosters, *without detonator*, 1.1D," "UN0030, Detonators, electric, *for blasting*, 1.1B," and "UN0361, Detonator assemblies, non-electric, *for blasting*, 1.4B" on the same MBT.

The answer is yes. Class 1 material, as authorized in § 172.101, may be transported in a MBT when packaged in accordance with § 173.66. Section 177.835(d) excepts MBTs from segregation requirements of § 177.848 when transported in accordance with § 173.66. Section 177.835(d) also requires that MBTs transporting Class 1 material with a Division 5.1, Class 8, or "NA1993, Combustible liquid, n.o.s., PG III" comply with segregation requirements of § 177.835(g). Since you are not transporting a Division 5.1, Class 8, or "NA1993, Combustible liquid, n.o.s." with authorized Class 1 material, you are not subject to the requirements on § 177.835(g). Therefore, as long as all other requirements of the HMR and IME Standard 23 are met, "UN0332, Explosive blasting, type E, 1.5D," "UN0042, Boosters, *without detonator*, 1.1D," "UN0030, Detonators, electric, *for blasting*, 1.1B," and "UN0361, Detonator assemblies, non-electric, *for blasting*, 1.4B" may be transported on the same MBT.

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

Sincerely,

Dirk Der Kinderen  
Chief, Standards Development  
Standards and Rulemaking Division

Geller  
117.835  
Class 1 Material  
116-0202

**Goodall, Shante CTR (PHMSA)**

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**From:** INFOCNTR (PHMSA)  
**Sent:** Friday, December 16, 2016 4:59 PM  
**To:** Hazmat Interps  
**Subject:** FW:  
**Attachments:** Scan0091.pdf  
  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi Shante/Alice,

Please submit this as a letter of interpretation. Please let me know if you have any questions.

Thanks,  
Jordan

**From:** twkenney@valleyviewindustries.com [mailto:twkenney@valleyviewindustries.com]  
**Sent:** Thursday, December 15, 2016 4:50 PM  
**To:** INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>  
**Subject:**

Please see attachment above in which we are requesting an interp response regarding a D.O.T. regulation of transporting hazardous materials.

We will wait for your response.

Thank you in advance.

Timothy W. Kenney  
Valley View Industries, Inc.  
Phone 815-358-2236  
Mobile 815-848-2269