



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

MAY 19 1999

Mr. Ronald C. Snyder
Zambelli Internationale Fireworks Mfg. Co., Inc.
Safety Office
RD #1, Box 270A
Edinburg, Pennsylvania 16116

Ref. No. 98-0340

Dear Mr. Snyder:

This is in response to your letter requesting clarification on the use of orientation arrows on packages containing Division 1.3G explosives, Display fireworks, under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). I regret the delay in responding to your inquiry and hope it has not caused you any inconvenience.

According to your letter, packages containing your Division 1.3G explosives materials are marked with orientation arrows indicating that they must be initiated with a certain side up. This kind of firework is initiated by laying the box in an upright position and lighting the fuse. As provided by § 172.312, orientation arrow markings are only required on packages containing liquid hazardous materials.

I hope this answers your inquiry.

Sincerely,

Delmer F. Billings
Standards Development
Office of Hazardous Materials Standards



980340

172.312

ZAMBELLI INTERNATIONALE
FIREWORKS MFG. CO. INC.
SAFETY OFFICE
RD#1 BOX 270 A
EDINBURG, PENNA. 16116
TELEPHONE NO. 1-800-797-6235
FAX # (724) 652-1456

Boothe
1172 312
a8-0340

DATE: 11-09-98

TO: ED MAZZULLO, DIRECTOR HMS.

FROM: RONALD C. SNYDER

SUBJECT: QUESTION ON ORIENTATION ARROWS

WE CARRY 1.3G EXPLOSIVES, DISPLAY FIREWORKS, WHICH DO NOT REQUIRE ORIENTATION ARROWS ON THE BOXES. HOWEVER SOME OF THE BOXES HAVE ARROWS ON THEM INDICATING THAT THEY MUST BE FIRED WITH A CERTAIN SIDE UP. THIS CERTAIN KIND OF FIREWORK IS FIRED BY LAYING THE BOX IN AN UP RIGHT POSITION AND LIGHTING THE FUSE.

ALLA MAGAZINER FROM THE OHIO PUC IS DEMANDING THAT WE USE THESE ARROWS AS ORIENTATION ARROWS WHILE SHIPPING. WE WORK VERY HARD AT COMPLYING WITH ALL STATE AND FEDERAL REGULATIONS, BUT WE DO NOT WANT ANY ADDITIONAL BURDEN. WE HAVE LOOKED ALL THROUGH THE REGULATIONS AND CAN'T FIND ANY REQUIREMENTS FOR THIS. THE ONLY REGULATIONS WE CAN FIND PERTAIN TO LIQUIDS, WHICH WE NEVER CARRY. CAN YOU PLEASE GIVE US YOUR OPINION ON THIS MATTER WE WILL ABIDE BY WHAT EVER YOU DECIDE.