



U.S. Department  
of Transportation  
**Research and  
Special Programs  
Administration**

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

JUN 28 2001

Mr. John D. Morgan  
Traffic Coordinator  
Alliant Aerospace Company  
P. O. Box 98  
Magna, UT 84044-0098

Reference No.: 01-0092

Dear Mr. Morgan:

This is in response to your April 12 letter requesting clarification of the marking and labeling requirements for shipments of large and robust rocket motors, Division 1.1C or 1.3C, under Packing Instruction 130 of § 173.62(c) of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). You stated that these articles are transported unpackaged, affixed to cradles secured on a flatbed or packaged in handling devices loaded in van trailers.

The marking and labeling requirements for these large and robust rockets depend on whether they are construed to be bulk or non-bulk packagings. Section 173.62(a) states that only non-bulk packagings are authorized under paragraph (c). Accordingly, § 172.301 states that a non-bulk packaging containing a hazardous material shall be marked with the proper shipping name and the identification number. Additionally, § 172.320 prescribes that a package containing Class 1 materials shall be marked with the EX-number. Under § 172.400, the packages would be labeled unless otherwise excepted; for example, by § 172.400(a)(5) or § 172.400a(a)(2). The markings and labels must be placed directly on the article, i.e. the rocket motor, on a tag or affixed by other suitable means.

I trust this information is helpful.

Sincerely,

Hattie L. Mitchell  
Chief, Regulatory Review and Reinvention  
Office of Hazardous Materials Standards



010092

173.62



Corbin  
§173.62 (130)  
Labeling & Marking  
Large Explosives  
01-0092

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400 7<sup>th</sup> South West  
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Attention: Edward T. Mazzullo  
Director of Hazardous Material Standards

Mr. Mazzullo,

Your support is needed in giving us direction in handling large rocket motors loaded with 1.1C and 1.3C explosives. Alliant Aerospace previously hauled these large robust motors on flat bed trailers using a DOT Exemption 3415. The DOT has since terminated the exemption and is now using the 49 CFR 173.62 note 130 for these shipments. The trouble that we are having with these shipments is what markings and labeling should be performed with regards to shipments of these large motors? The motors we are now shipping are either hauled on flat bed trailers or in enclosed vans with their support equipment. We have had three different interpretations by three different sources within the DOT on ways we should perform our marking and labeling. The first verbal instruction we received: It is not packaged (unpackaged), therefore, just placard the shipment, no other marking or labeling is necessary. The second instruction: placard the shipment 1.1C or 1.3C, mark the shipment with the UN Marking 0280 or 0188. The third set of instructions we have received: placard, mark the UN0280 or UN0188, proper shipping name and the EX-number.

Mr. Mazzullo, we want to comply with the correct requirements. We are seeking your direction when we are shipping large robust motors that are either shipped on flat bed trailers securely cradled to prevent movement during transport or in enclosed vans with the necessary support equipment to secure them from movement. We need your direction as to what we should do when it comes to the requirements of marking and labeling. Please see the attached letters and e-mail that I have received with regards to the packaging note 130.

Your direction in this matter will be very much appreciated

Sincerely,

John D. Morgan  
Traffic Coordinator

Jm042001