



U.S. Department  
of Transportation

**Research and  
Special Programs  
Administration**

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

**MAY 12 2004**

DOT-E 8215  
(EIGHTEENTH REVISION)

EXPIRATION DATE: March 31, 2006

(FOR RENEWAL, SEE 49 CFR § 107.109)

1. GRANTEE: Olin Corporation/Brass and Winchester, Inc.  
East Alton, IL
  
2. PURPOSE AND LIMITATION:
  - a. This exemption authorizes the transportation in commerce of certain Division 1.1, 1.3 and 1.4 explosives, Division 4.1 flammable solids and ORM-D materials in non-DOT specification packagings without labels and EX-number markings to a distance not to exceed 7/10 mile by motor vehicle or rail freight, subject to the limitations and special requirements specified herein. This exemption provides no relief from any Hazardous Materials Regulation (HMR) other than as specifically stated herein.
  
  - b. The safety analyses performed in development of this exemption only considered the hazards and risks associated with transportation in commerce.
  
  - c. No party status will be granted to this exemption.
  
3. REGULATORY SYSTEM AFFECTED: 49 CFR Parts 106, 107 and 171-180.
  
4. REGULATIONS FROM WHICH EXEMPTED: 49 CFR 172, Subpart E (Labeling); § 172.320 in that the marking of EX-numbers on packagings is required except as specified herein; and §§ 173.62(c) Table and 173.230 in that non-DOT specification packaging is not authorized for Class 1 and Division 4.1 substances except as specified herein.

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5. BASIS: This exemption is based on the application of Olin Corporation/Winchester Division dated December 10, 2003 submitted in accordance with §§ 107.109 and 107.105 and the public proceeding thereon.
6. HAZARDOUS MATERIALS (49 CFR § 172.101):

Proper Shipping Name/ Hazardous Materials Description	Hazard Class/ Division	Identi- fication Number	Packing Group
Diazodinitrophenol, wetted	1.1A	UN0074	II
Lead styphnate, wetted	1.1A	UN0130	II
Waste substances, explosive, n.o.s. (sponges and rags impregnated with initiating explosives)	1.1A	UN0473	II
Substances, explosive, n.o.s. (Potassium Styphnate, wetted)	1.1A	UN0473	II
Substances, explosive, n.o.s. (mixtures of lead styphnate-90% and tetrazene-10%)	1.1A	UN0473	II
Tetrazene, wetted	1.1A	UN0114	II
Trinitroresorcinol, wetted	1.1D	UN0394	II
Powder, smokeless	1.3C	UN0161	II
Primers, cap type	1.4B	UN0378	II
Waste cartridges, small arms	1.4C	UN0339	II
Primers, cap type	1.4S	UN0044	II
Waste cartridges, small arms	1.4S	UN0012	II
Waste cartridges for weapons, blank	1.4S	UN0014	II
Waste Smokeless powder for small arms (100 pounds or less)	4.1	NA3178	II
Waste nitrocellulose with water with not less than 25 percent	4.1	UN2555	II

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Proper Shipping Name/ Hazardous Materials Description	Hazard Class/ Division	Identi- fication Number	Packing Group
Diazodinitrophenol, wetted	1.1A	UN0074	II
Lead styphnate, wetted by mass	1.1A	UN0130	II
Cartridges, small arms	ORM-D	none	N/A

NOTE: The EX-Approval Numbers for all Class 1 explosive articles or substances must be identified to and acknowledged in writing by the Office of Hazardous Materials Exemptions and Approvals (OHMEA) prior to their first shipment under this exemption. A list of currently authorized Class 1 explosive articles and substances is shown in Appendix B.

7. SAFETY CONTROL MEASURES:

a. PACKAGING: The following packagings are prescribed:

(1) Division 1.3C smokeless powder (wetted with not less than 30% water) and Division 1.4B or 1.4S waste primers, cap type, which are under water or oil, must be placed in plastic bags and then placed in porcelain buckets, or plastic buckets not exceeding 4 gallons capacity. The plastic bags must be closed so that the water content of the smokeless powder is at least 30% by weight and the primers are completely immersed in water or oil at all times during transportation.

(2) ORM-D cartridges, small arms must be placed in a wooden box with hinged lid, open plastic containers, open metal tote boxes or multi-compartment carrying trays. Other than wooden boxes, loaded packagings must be placed in a wood rack within a motor vehicle **or** within a rail car to prevent movement during transport.

(3) Divisions 1.4C and 1.4S waste cartridges, small arms and waste cartridges for weapons, blank must be placed in open 55 gallon drums, 3 gallon plastic buckets, 4 gallon plastic pails, or 3 gallon porcelain buckets and loaded in a motor vehicle or rail car.

(4) Division 1.1A lead styphnate, tetrazene and diazodinitrophenol; or Division 1.1D trinitroresorcinol,

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wetted must be placed in a textile cloth or rubber coated, textile cloth bag which is then placed in a stainless steel container. The Division 1.1A or 1.1D explosives and bag must be covered with at least 2 or 3 inches of water or a 50/50 solution of water and anti-freeze agent, when necessary to prevent freezing. The stainless steel container is then securely closed with a heavy plastic lid and placed into a rugged plastic support rack in a specially designed motor vehicle trailer shown in photographs attached to Olin Corporation/Winchester Division's application of November 2, 2001 on file with OHMEA.

(5) Division 1.1A waste explosive substances, n.o.s (mixtures of lead styphnate-90% and tetrazene-10%) must be placed in a rubber lined aluminum container of approximately 3-quart liquid capacity. The material must be completely covered with approximately 1 inch of water or a 50/50 solution of water and antifreeze agent, when necessary to prevent freezing. The rubber-lined aluminum container is then securely closed with a heavy plastic lid and placed into a rugged non-metallic support rack in a specially designed motor vehicle trailer shown in photographs attached to Olin Corporation/Winchester Division's application of November 2, 2001 on file with OHMEA.

(6) Division 1.1A substances, explosive, n.o.s. (sponges and rags contaminated with initiating explosives) must be placed in 3 gallon capacity porcelain or plastic buckets, or 4 gallon capacity plastic pails, and totally covered with water or a solution of water and antifreeze when necessary to prevent freezing.

(7) The maximum "dry" weight of Division 1.1A or 1.1D explosive substances in any one container shall not exceed 6.5 pounds (2.95 Kilograms.) The maximum "dry" weight of Division 1.1A or 1.1D substances in the specially designed trailer shall not exceed 117 pounds (53.2 Kilograms).

(8) Division 1.4B and 1.4S primers, cap type must be transported in one of two ways: (i) placed in a hand buggy which has eight trays. Each hand buggy tray may contain up to eight pans which can carry 12,300 small arms primers per tray. Each hand buggy may carry up to a total of 98,400 small arms primers. Up to eight hand

buggies may be loaded on a motor vehicle or trailer or rail car equipped with locking features for each hand buggy; (ii) placed in cellular plastic trays containing up to 1000 primers per tray or cellular fiberboard trays containing up to 620 primers per tray, which are covered and placed in a wooden outer box. Each outer box may contain up to 27,280 primers.

(9) Samples of Division 4.1 "Smokeless powder for small arms" must be placed in plastic, fiberboard or metal receptacles having positive closures, each containing not more than eight (8) pounds net weight of smokeless powder. The plastic, fiberboard or metal receptacles must then be placed in strong outer packagings and cushioned to prevent movement of the inside containers. Not more than 100 pounds net weight of smokeless powder may be loaded in any one motor vehicle or rail car.

(10) Division 4.1 waste nitrocellulose with water (or a solution of water and antifreeze when necessary to prevent freezing) not less than 25 percent by mass, must be placed in plastic bags closed by either tape or twist ties. The plastic bags must be placed in 3 gallon capacity porcelain or plastic buckets, or 4 gallon plastic pails.

(11) The Division 1.1A potassium styphnate shall be wetted with not less than 30 percent water or a water-alcohol mixture by weight. The following packaging method is assigned: Inner Packaging - Bags, waterproof plastic or rubber-coated cloth, securely tied or taped closed. Outer Packaging - Non-specification containers, stainless steel with closure lids securely affixed and sealed, each containing not more than fifteen pounds net weight of an explosive substance. The container must be mounted in sturdy wooden or plastic cradles or racks or fixed in such a way as to prevent all movement during transportation.

b. OPERATIONAL CONTROLS:

(1) Transportation in commerce under this exemption is strictly limited to the Olin Corporation, Winchester Division facilities in East Alton, Illinois, for a distance of up to 7/10 mile on a public highway which bisects the plant or on a railroad siding which parallels the public highway.

(2) All packages shipped under this exemption must be transported by Olin Corporation/Winchester Division's company-owned or leased motor vehicles and trailers operated by company employees or railroad employees and in railroad-owned or leased rail cars.

8. SPECIAL PROVISIONS:

a. The packages shipped under this exemption are exempted from § 172.320 and Subpart E (Labeling) of Part 172. Placarding the vehicle is required.

b. A current copy of this exemption must be maintained at each facility where the package is offered or reoffered for transportation

9. MODES OF TRANSPORTATION AUTHORIZED: Motor vehicle and rail freight.

10. MODAL REQUIREMENTS: A current copy of this exemption must be carried aboard each motor vehicle used to transport packages covered by this exemption.

11. COMPLIANCE: Failure by a person to comply with any of the following may result in suspension or revocation of this exemption and penalties prescribed by the Federal hazardous materials transportation law, 49 U.S.C. 5101 et seq:

o All terms and conditions prescribed in this exemption and the Hazardous Materials Regulations, 49 CFR Parts 171-180.

o Registration required by § 107.601 et seq., when applicable.

o Persons operating under the terms of this exemption must comply with the security plan requirement in Subpart I of Part 172 of the HMR, when applicable.

Each "Hazmat employee", as defined in § 171.8, who performs a function subject to this exemption must receive training on the requirements and conditions of this exemption in addition to the training required by §§ 172.700 through 172.704.

No person may use or apply this exemption, including display of its number, when the exemption has expired or is otherwise no longer in effect.

12. REPORTING REQUIREMENTS: The carrier is required to report any incident involving fire, explosion or loss of packaging contents or packaging failure to the Associate Administrator for Hazardous Materials Safety (AAHMS) as soon as practicable. (Sections 171.15 and 171.16 apply to any activity undertaken under the authority of this exemption.) In addition, the holder(s) of this exemption must inform the AAHMS, in writing, of any incidents involving the package and shipments made under the terms of this exemption.

Issued in Washington, D.C.:

*Robert A. McGuire*  
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Robert A. McGuire  
Associate Administrator for  
Hazardous Materials Safety

**MAY 12 2004**

\_\_\_\_\_  
(DATE)

Address all inquiries to: Associate Administrator for Hazardous Materials Safety, Research and Special Programs Administration, Department of Transportation, Washington, D.C. 20590.  
Attention: DHM-31.

Copies of this exemption may be obtained by accessing the Hazardous Materials Safety Homepage at <http://hazmat.dot.gov/exemptions> Photo reproductions and legible reductions of this exemption are permitted. Any alternation of this exemption is prohibited.

PO: SCW/AM

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APPENDIX A

EX-APPROVAL NUMBERS OF ALL UN 0161, POWDER, SMOKELESS, CLASS 1.3C  
CURRENTLY AUTHORIZED UNDER THIS EXEMPTION

- EX-8204024
- 8204024A
- 8204024B
- 8204024C
- 8204024D
- 8204025B
- 8204032A
- 8204032B
- 8204033
- 8206038A
- 8210070
- 8210070A
- 8307179
- 8307180A
- 8307180B
- 8307180C
- 8307183A
- 8307183H
- 8307184B
- 8307186A
- 8307186B
- 8307186M
- 8307186Q
- 8307187B
- 8307187C
- 8307189A
- 8307190
- 8307190A
- 8307190B
- 8307190C
- 8307190E
- 8307190G
- 8307191
- 8307191A
- 8307191B
- 8404001
- 8404004
- 8404005
- 8408178
- 8408178A
- 8408179

APPENDIX A (Continued)

-8408179A  
-8408179C

EX-APPROVAL NUMBERS OF ALL UN 0161, POWDER, SMOKELESS, CLASS 1.3C  
CURRENTLY AUTHORIZED UNDER THIS EXEMPTION

EX-8410003  
-8410003C  
-8410024  
-8410025  
-8410026  
-8502101A  
-8502019C  
-8502019H  
-8502019O  
-8510021  
-8511069A  
-8601170  
-8601170A  
-8601171  
-8601172  
-8703006E  
-8803060  
-8804052  
-8804053  
-8804055  
-8804056  
-9003214  
-9003215  
-9003216  
-9003217  
-9003218  
-9003219  
-9003220  
-9003224  
-9003225  
-9003243  
-9004359  
-9004361  
-9004361C  
-9006145A  
-9006145B  
-9006145D  
-9304125  
-9305018  
-9305028D

APPENDIX A(Continued)

EX-APPROVAL NUMBERS FOR ALL UN 0044, PRIMERS, CAP TYPE, CLASS  
1.4S CURRENTLY AUTHORIZED UNDER THIS EXEMPTION

EX-8607060  
-8712135  
-8712136  
-8712137  
-8712138  
-8712139  
-8712140  
-8712141  
-8712142  
-8712143  
-8712144  
-8712145  
-8712146  
-8712147  
-8712148  
-8712149  
-8712150  
-8702152  
-8702153  
-8702154  
-8712155  
-8712156  
-8811100  
-9204022  
-9301083  
EX2003100197

EX-APPROVAL NUMBERS FOR ALL UN 0378, PRIMERS, CAP TYPE, CLASS  
1.4B CURRENTLY AUTHORIZED UNDER THIS EXEMPTION

EX-9210119  
-9304031  
-9301160  
-9401091

## APPENDIX A (continued)

EX-APPROVAL NUMBERS FOR ALL DIVISION 1.1A EXPLOSIVES CURRENTLY  
AUTHORIZED UNDER THIS EXEMPTION

UN 0130	Lead styphnate, wetted	EX-9004357
UN 0114	Tetrazene, wetted	EX-9004354
UN 0074	Diazodinitrophenol	EX-8805139
		EX-9807026
		EX-9807026A
UN 0473	Substances, Explosive, n.o.s.	EX-9310187
" "	" "	EX-9310188
" "	" "	EX2003040202

EX-APPROVAL NUMBERS FOR ALL DIVISION 1.1D EXPLOSIVES CURRENTLY  
AUTHORIZED UNDER THIS EXEMPTION:

EX2001100043