

## OSHA Directives

### STD 1-5.18A - Acceptance of U.S. Department of Transportation Exemption DOT-E 8845

---

- **Record Type:** Instruction
  - **Directive Number:** STD 1-5.18A
  - **Subject:** Acceptance of U.S. Department of Transportation Exemption DOT-E 8845
  - **Information Date:** 07/12/1994
- 

OSHA Instruction STD 1-5.18A  
July 12, 1994  
Office of General Industry  
Compliance Assistance

Subject: Acceptance of U.S. Department of Transportation (DOT) Exemption DOT-E 8845 of the Select Fire Oil-Well Perforating System Detonator Interruption Device (DID)

A. **Purpose.** This instruction permits the transportation of specially designed and equipped select fire oil-well perforating guns with detonators affixed under certain conditions.

B. **Scope.** This instruction applies OSHA-wide.

C. **Cancellation.** OSHA Instruction STD 1-5.18, August 4, 1986, is canceled.

D. **Action.** OSHA Regional Administrators/Area Directors shall take action to permit the transportation of specially designed and equipped select fire oil-well perforating guns, with detonators affixed, when covered by DOT Exemption DOT-E 8845 and guidelines as set forth in E of this instruction.

E. **Guidelines.** This instruction is based upon the need to resolve the potential inconsistency in applying OSHA standard 1910.109(b)(1) and a DOT exemption which permits under certain specified conditions the transportation of charged oil-well guns with detonators attached. Under 29 CFR 1910.109(d)(1)(iv), OSHA requires that detonators and explosives be transported separately over the highways. While this standard only covers public highways regulated by DOT, OSHA believes transport of these devices in many of highway situations may violate 1910.109(b)(1). However, OSHA has determined that it is a de minimis violation of 1910.109(b)(1) to transport directly to the oil well site charged oil-well guns with detonators attached, if the gun is covered by DOT Exemption DOT-E 8845 and the Detonation Interruption Device (DID) is in place between each detonator and the primacord leading to the individual jet perforator. It is thus permissible to use the DOT Exemption DOT-E 8845 in the transportation of charged oil-well guns with detonators attached. The provisions of the DOT exemption include:

1. The charged oil-well guns classified by DOT as Division 1.1 or Division 1.4 based on UN classification and effective in October 1, 1993 (prior to January 1, 1991, classified as Class A and Class C explosive, OSHA Instruction STD 1-5.18A respectively), are identified as "Select Fire Hollow Steel Carriers" and "Select Fire Retrievable Tubing Guns" and are the only ones so exempted.
2. Transportation must be by motor vehicle or cargo vessel operated by private carriers engaged in oil well operations.
3. Transportation is authorized only from the gun assembly site (wireline shop) to the jobsite.
4. Vehicle operator must be instructed as to the necessary safeguards and proper procedure in the event of an unusual delay, fire or accident.
5. A copy of the Exemption DOT-E 8845 must be carried aboard each motor vehicle and vessel used to transport packages covered by this exemption, attesting that the wireline operator has been granted the Exemption DOT-E 8845 certificate.
6. Authorization (DOT-E 8845 (PTE)) forms a part of Exemption DOT-E 8845 and must be attached to it. In cases where an extension has been granted, DOT-E 8845 (Extension), it must also be attached to Exemption (DOT-E 8845), in order for the Exemption to be acceptable to OSHA. These attachments include expiration dates of the exemption for the party(ies) listed as Exemption Holders.

#### **F. Background.**

1. The United States Department of Transportation (DOT) has granted Exemption DOT-E 8845 to a few companies to transport from the gun assembly site (wireline shop) to the jobsite, specially designed and equipped select fire oil-well perforating guns with detonators affixed. They believe that the hazard-in transporting the particular assembled gun over the highway has been eliminated.
2. OSHA concurs with DOT on the highway transportation from the assembly shop to the jobsite and allows further transportation on the jobsite directly to the oil well site, under certain conditions, as cited in E.

#### **G. Reference.** 29 CFR 1910.109(b)(1).

**H. Federal Program Change.** This instruction describes a Federal program change which affects State programs. Each Regional Administrator shall:

1. Ensure that this change is forwarded to each State designee, using a format consistent with the Plan Two-way Memorandum in Appendix P, OSHA Instruction STP 2.22, CH-3.
2. Explain the technical content of the change to the State designee.

3. Ensure that State designees are asked to acknowledge receipt of the Federal program change in writing, to the Regional Administrator as soon as the State's intention is known, but no later than 70 calendar days after the date of issuance (10 days for mailing and 60 days for response). This acknowledgement should include a description either of the State's plan to implement the change or of the reasons why the change should not apply to that State.
4. Advise the State designees that a plan supplement is not required for implementation of this change. However, if the State's interpretation of its standard is different from OSHA's, the State shall submit a copy of its interpretation to the Regional Administrator.
5. Review policies and guidelines issued by the State to determine if this change has been communicated to State program personnel.

John B. Miles, Jr., Director Directorate of Compliance Programs

DISTRIBUTION: National, Regional and Area Offices All Compliance Officers State Designees  
7(c)(1) Project Managers NIOSH Regional Program Directors

---