

Federally Licensed Explosives Dealers Must:

Maintain all records of explosive material importation, shipment, receipt, sale, or other disposition, whether temporary or permanent. Retain in permanent form (i.e., commercial invoices, record books) on the business premises for 5 years from the transaction date or until discontinuance of business or operations. When going out of business, send records to the ATF Out-of-Business Records Center.

Annual Inventory

Take an annual physical inventory of all explosive materials on hand and a special inventory:

- When commencing business, (the explosives license effective date);
- When changing the business location to another region;
- When discontinuing business; and
- At any time ATF may require such in writing.

If a special inventory has not been taken during the calendar year, at least one physical inventory must be taken and recorded in the DSMT. If the inventory and DSMT do not match, a full inventory and reconciliation of any discrepancies is strongly encouraged.

Explosive Material Purchase or Acquisition

No later than close of the next business day following the date of acquisition, enter in a separate record:

- Date of purchase or other acquisition;
- Name or brand name of manufacturer and name of importer (if any);
- Manufacturer's marks of identification;
- Quantity (in applicable units);
- Description and size (length and diameter or diameter only of display fireworks); and
- Name, address, and license/permit number of person from whom materials are received.

Explosive Material Distribution

No later than close of the next business day following the date of use (by dealer) or distribution to a licensee or a permittee, enter in a separate record:

- Date of disposition;
- Name or brand name of manufacturer and name of importer, if any;
- Manufacturer's marks of identification;
- Quantity (in applicable units);
- Description and size; and
- License or permit number of person to whom the materials were distributed.

Maintain separate records of sales or other distribution made to nonlicensees/nonpermittees as prescribed by § 555.126.

Commercial Records

When keeping commercial records showing acquisition or distribution information required for the permanent record, dealers may delay entry into the permanent acquisition or distribution record for no more than 7 days following the acquisition or distribution date. Until the required entry is made in the permanent record, dealers must keep commercial records separate from other commercial documents and available for inspection on the licensed premises.

Exporting Explosive Materials

Maintain records showing the acquisition, quantity, manufacturer's name or brand name of explosive materials, name and address of the foreign consignee of materials, and the exportation date.

This overview is intended as general guidance. The Federal explosives regulations at 27 CFR, Part 555 provide specific regulatory requirements. This overview is intended as an aid to compliance with those regulatory requirements—not as a replacement.

U.S. Department of Justice
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ATF Recordkeeping Requirements for Dealers of Explosive Materials



