



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Ave., S.E.
Washington, DC 20590

JUL 31 2008

Mr. William Gramer
Specialist, 3M Package Engineering
3M Sourcing Operations
3M Center 216-02N-08
St. Paul, MN 55144-1000

Ref. No. 08-0089

Dear Mr. Gramer:

This responds to your March 26, 2008 letter requesting clarification of the second sentence of "Note 2" in Explosive Package Instruction 115 in §173.62 of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180.) Specifically, you request clarification or confirmation of your understanding of this requirement in the HMR.

In Packing Method 115, the second sentence states that a composite package consisting of a plastic receptacle in a metal drum (6HA1) may be used in lieu of combination packaging. This means that a composite UN 6HA1 plastic inner receptacle within an outer metal package may be shipped as a PG II certified single package in lieu of a combination package. A Class 1 material appropriately packaged in accordance with Packing Method 115, Note 2, in a composite package 6HA1 does not require additional outer packaging or absorbent material specified for other liquid explosives covered and packaged in combination packagings according to Note 1.

I hope this answers your inquiry.

Sincerely,

Susan Gorsky
Acting Chief, Standards Development
Office of Hazardous Materials Standards

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3173-63
Packaging Exceptions
08-0089



Mr. Edward T. Mazzullo
Director, Office of Hazardous Materials Standards
Pipeline and Hazardous Materials Safety Administration
U.S. Department of Transportation, East Building
1200 New Jersey Avenue, SE
Washington, DC 20590-0001

Attention: Office of Hazardous Materials Standards, PHH-10 (Second Floor, E24-314)

Subject: Interpretation Letter Request

26 March 2008

Dear Mr Mazzullo,

We are writing to confirm or clarify our understanding of the second sentence of "Note 2" within Explosive Package Instruction 115 in section 49 CFR §173.62.

When a material is covered and packaged according to Note 2 (EX #s that specify UN #s 0075, 0143, 0495, and 0497), the second sentence of the note in this instruction states that "...A composite package may be used in lieu of combination packaging". We believe this to mean that a composite UN 6HA1 plastic inner receptacle within an outer metal package may be shipped as a PG I or II certified single package '...in lieu of a combination package...', and thus without the need for additional outer packaging or absorbent material specified for other liquid explosives covered and packaged in combination packagings according to Note 1.

Would you please confirm or clarify our understanding? As this applies to a shipment related to a Department of Defense (DOD) contract, may we please have a reply by April 30th, 2008?

Thank you in advance. If you have need of any further information please use any of the means below to contact me, including my direct phone and electronic mail address.

Sincerely,

William Gramer,

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St Paul, MN 55144 - 1000
USA
Direct Phone: 651 736 1407. Electronic Mail: wgramer@mmm.com

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