



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, D.C. 20590

OCT 24 2014

Ms. Laura Buholca  
Plant Manager  
5N Plus Wisconsin, Inc.  
6474 Blanchar's Crossing  
Windsor, WI 53598

Ref. No. 14-0136

Dear Ms. Buholca:

This responds to your July 11, 2014 request for clarification on the reuse of metal and plastic drums under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if you need a wall thickness marking on the UN 1H2 drum (used as the outer packaging of a combination packaging) used to transport "UN3260, Corrosive solids, acidic, inorganic, n.o.s. (gallium trichloride), 8, PGII," under the reuse provisions in § 173.28(b)(4).

In a conversation with a member of our staff in the Hazardous Materials Information Center (HMIC), you asked if the wall thickness marking is required to reuse a UN 1H2 plastic drum. The HMIC informed you that under § 173.28(b)(4) the wall thickness marking is required to be marked on the drum if it is the outer drum of a composite packaging or a single packaging. It is your understanding then that combination packaging is not required to be marked with the wall thickness under the reuse provisions in § 173.28(b)(4).

Your understanding is correct. In accordance with §§ 173.28(b)(4) and 178.503(a)(9), plastic drums used as single packagings or outer packaging of composite packagings and intended to be reused must be marked with the minimum wall thickness of the packaging material. Thus, a plastic drum of a combination packaging is not required to be marked with the wall thickness. The packaging scenario you illustrate is considered a combination packaging by definition and is not required to be marked with the wall thickness under the reuse provisions in § 173.28(b)(4).

I hope this answers your inquiry. If you need additional assistance, please contact this Office at (202) 366-8553.

Sincerely,

Dirk Der Kinderen  
Acting Chief, Standards Development Branch  
Standards and Rulemaking Division

Boothe  
178.503 / 173.28

**Goodall, Shante CTR (PHMSA)**

**From:** INFOCNTR (PHMSA)  
**Sent:** Monday, July 14, 2014 4:07 PM  
**To:** Hazmat Interps  
**Subject:** FW: letter of interpretation

Markings of Packings  
14-0136

Hi Alice and Shante,

We received this request for a letter of interpretation. Thanks.

-Adam

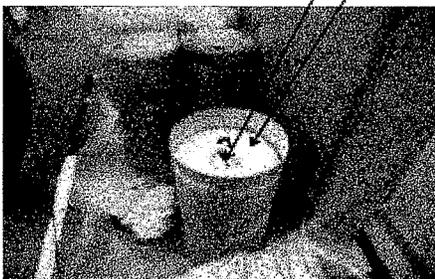
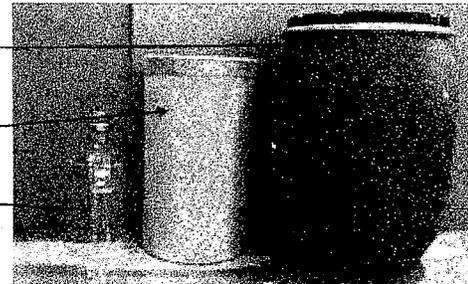
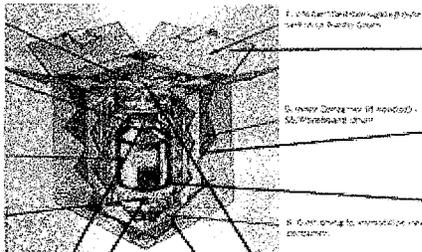
**From:** Laura Buholca [mailto:Laura.Buholca@5nplus.com]  
**Sent:** Friday, July 11, 2014 3:10 PM  
**To:** PHMSA HM InfoCenter  
**Subject:** letter of interpretation

Good afternoon,

I spoke to Adam earlier today and received a very good interpretation on the topic; however, in order to satisfy my customers request, I would like to receive letter of interpretation, because our goal is to be in complete compliance and transport our haz mat product safely.



- 1. Hazardous material identification
- 2. Original tags
- 3. Nature of product
- 4. Distinguishing material from other quantities



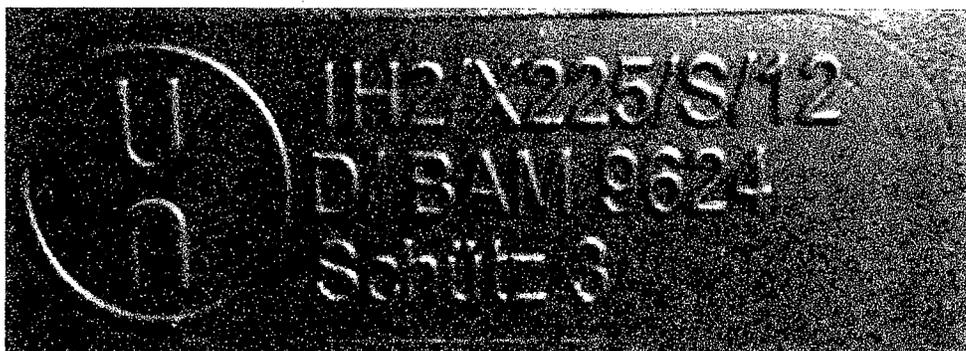
Material we are shipping:  
UN3260  
Corrosive Solids, Acidic,  
Inorganic, N.O.S. (Gallium Trichloride)  
CLASS 8  
PG II

Here is the packaging what we are using:

Material (7.5 kgs) is being placed in glass ampule; seal tape is applied; ampule is placed in fibreboard drum with foam cushioning, it is packaged tight filling all space between bottle and fibreboard drum (picture on lower left); fibreboard drum is sealed with tape and placed in plastic bag and bag is sealed; all that is inserted into blue outer drum; foam cushioning fills space between fibreboard drum and blue drum; Blue drum is sealed;

The question is regards outer drum; drum is UN certified, but has no wall thickness identified on the drum.

Here is the specifications for the drum:



My question is – do we need a wall thickness, any additional certification or anything else possible that I've overlooked regards this outer drum that would limit us from re-using this drum for future shipments.

Please do not hesitate to contact me if there is any additional information needed.

Many thanks  
Laura

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