



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

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

**MAY 05 2010**

Ms. Cherie Walton  
Reactives Management Corporation  
1025 Executive Blvd., Suite 101  
Chesapeake, VA 23320

Ref. No.: 05-0111R

Dear Ms. Walton:

This is a follow up to your April 28, 2005 letter requesting clarification regarding the general packaging requirements specified under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). You asked if it is permissible for a specification combination package (a UN 4G fiberboard box with inner metal receptacles), which was tested for liquids, to be filled with a solid material as long as the gross mass marked on the packaging is not exceeded. This letter is a revision to our original response from June 17, 2005.

The HMR, at § 178.602, require each packaging to be closed in preparation for testing and tests to be carried out in the same manner as if prepared for transportation, including inner packagings in the case of combination packagings. Therefore, a combination packaging design originally tested with inner packagings containing liquids may not be used to package solid materials, as a single package or otherwise, without further testing.

I hope this information is helpful. Should you have any further questions, please contact this office.

Sincerely,

A handwritten signature in black ink, appearing to read 'H. Mitchell'.

Hattie L. Mitchell, Chief  
Regulatory Review and Reinvention  
Office of Hazardous Materials Standards

§173.24a (b)(3)

Non-bulk Packagings  
Packages

05 - 0111

**INFOCNTR <PHMSA>**

**From:** reactives@earthlink.net  
**Sent:** Thursday, April 28, 2005 12:39 PM  
**To:** INFOCNTR <PHMSA>  
**Subject:** Information Center Comments/Questions

Complete by Phone, Left VM to call HMIC 4/28/2005 KAL

Below is the result of your feedback form. It was submitted by Cherie Walton (reactives@earthlink.net) on Thursday, April 28, 2005 at 12:38:35.

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Email: reactives@earthlink.net

Name: Cherie Walton

Category: Shippers-General Requirements for Shipments and Packagings (Sections 173.1 - 173.476)

Organization: Reactives Management Corp.

Street: 1025 Executive Blvd., Suite 101

City: Chesapeake

State: Virginia

Zip Code: 23320

Phone: 757-436-1033

Fax: 757-548-2808

Comments: RE: Combination packaging.

We have two sizes of combination packagings which are intended to hold liquids. Each combination packaging consists of inner metal cans (e.g. metal paint cans) with locking rings. These are packed inside a 4GY.

The markings on the outer 4Gs are as follows:

4G/Y9.6/S/04 USA/+AX4033

and

4G/Y38.5/S/05 USA/+AZ4600

According to 173.24a(b)(3), which addresses single or composite non-bulk packaging (not combination packagings), solids may be packed in non-bulk packaging which has been tested for liquids.

Can we use the above 4Gs (since they are marked with an "S") for solids as long as the gross mass in kilograms does not exceed the rated capacity of the packaging in liters?

If so, are we required to pack the solids in the approved inner receptacles (paint cans)?

Thanks for your help.

4/28/2005