



U.S. Department
of Transportation

Pipeline and Hazardous Materials
Safety Administration

1200 New Jersey Ave., SE
Washington, DC 20590

OCT 29 2009

Mr. John A. McQuaid
Industrial Packaging Alliance of North America
IPANA/SSCI
PO Box 100907
Arlington, VA 22210

Ref. No.: 09-0185

Dear Mr. McQuaid:

This responds to your August 5, 2009 letter regarding the applicability of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) to the manufacturing and testing of steel drums. Your questions are paraphrased and answered below.

Q1. Does a change in the type of rolling hoops (w-style vs. standard) used in the production of a 55-gallon steel drum constitute a design change that requires new qualification testing as prescribed in § 178.601(g)(8).

A1: No. A change in the type of rolling hoops (w-style vs. standard) does not qualify as a design change requiring new qualification testing under the provisions of § 178.601(g)(8).

Q2: When testing 1A2 steel drums for solids, is it permissible to use both bagged and loose material inside the drum to make the materials easier to re-use in later packaging testing?

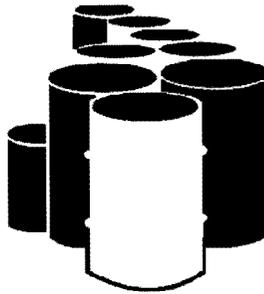
A2. Yes, provided the use of the bagged and loose material does not interfere with any potential loss of contents during testing of the drum. In addition, the material must be of the same or higher specific gravity as the material to be transported and its other physical properties (grain, size, viscosity) that might influence the results of the required tests must correspond as closely as possible to those of the hazardous material to be transported. This includes assuring that the bags of material are interspersed evenly throughout the package and not placed at the top or bottom of the drums as to interfere with the testing of the package.

I trust this satisfies your inquiry. Please contact us if we can be of further assistance.

Sincerely,

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

Steel Shipping Container Institute



Andrews
§178.601
Testing
09-0185

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John A. McQuaid
Executive Director

Transmitted electronically

August 5, 2009

Mr. Edward T. Mazzullo
Director, Office of Hazardous Materials Standards
U.S. DOT/PHMSA (PHH-10)
1200 New Jersey Avenue, SE East Building, 2nd Floor
Washington, DC 20590

Dear Mr. Mazzullo:

On behalf of the steel drum manufacturers that are members of the Steel Shipping Container Institute, I am writing to obtain interpretations from your office on two issues relating to the manufacture and testing of steel drums.

First, under the HMR does a change in the type of rolling hoop (w-style vs. standard) in the production of a 55-gallon steel drum constitute a design change that requires new qualification testing?

Second, when testing 1A2 steel drums for solids is it permissible, under the HMR, to place bagged fill material inside the container to make it easier to re-use in later packaging testing? Interspersed with the bagged material and filling the drum would be loose material of a grain size similar to that of the intended lading. Thus, the materials filling the 1A2 steel drum for solids testing would be comprised of both bagged and loose materials.

We look forward to your response to these inquiries.

Sincerely,