



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue SE
Washington, DC 20590

OCT 14 2011

Mr. Peter R. Apostoluk
Technical Director-Plastic and IBC Products
Greif Packaging LLC
366 Greif Parkway
Delaware, OH 43015

Ref. No. 11-0187

Dear Mr. Apostoluk:

This responds to your August 10, 2011 request for clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-185). Specifically, you ask if the 6HA1 mark for a steel tight (non removable) head composite drum also applies to a steel open (removable) head composite drum.

The answer is yes. There is no distinction between closed and open head steel drums under identification code "6HA1." The identification code "6HA1" is the only authorized code under § 178.522(a) for a plastic receptacle within a protective steel drum. Therefore, code "6HA1" should be used for all steel drum composite packaging with inner plastic receptacles.

I hope this answers your inquiry. If you need additional assistance, do not hesitate to contact this office at (202) 366-8553.

Sincerely,

Ben Supko
Acting Chief, Standards Development Branch
Standards and Rulemaking Division

Boothe
3178.522(a)
Packaging

Drakeford, Carolyn (PHMSA)

From: INFOCNTR (PHMSA)
Sent: Wednesday, August 10, 2011 4:34 PM
To: Drakeford, Carolyn (PHMSA)
Subject: FW: Hazmat Information Center Feedback: Highway (Sections 177.800 – 177.870)

11-0187

Hi Carolyn,

This caller requested we forward this e-mail as a formal request for a letter of interpretation.

Thanks,
Victoria

Victoria Lehman
Hazmat Information Center (HMIC)
<http://phmsa.dot.gov/hazmat/info-center>
(202) 366-1035

-----Original Message-----

From: PHMSA-Feedback [mailto:PHMSA-Feedback]
Sent: Wednesday, August 10, 2011 11:02 AM
To: PHMSA HM InfoCenter; PHMSA Webmaster
Subject: Hazmat Information Center Feedback: Highway (Sections 177.800 – 177.870)

Completed by Ae via phone on 8/10/11 at 2:42 left vm

Does the 6HA1 mark for a steel tight (non removeable) head composite drum also apply to a steel open(removeable) head composite drum?

178.522(a) indicates that all steel composite drums are 6HA1.

However, by definition, should there not be a distinction between a tight head composite drum and an open head composite drum, with the latter composite steel being marked as a 6HA2?

Thanks for your interpretation.

Name: Peter Apostoluk
Email:
Phone: 740-657-6611