



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

400 Seventh Street, S.W.
Washington, D.C. 20590

DEC 3 1998

Ms. Nancy J. Copelin
Hazmat Environmental Group, Inc.
New Village Industrial Park
60 Commerce Drive
Buffalo, NY 14218-1040

Ref. No. 98-0313

Dear Ms. Copelin:

This is in response to your October 16, 1998 letter concerning the definition of "bulk packaging" as defined in the 49 CFR 171.8. Your question was further clarified in a phone conversation to request a definition of "maximum net mass" which is used to define a bulk packaging.

Your understanding is correct. If your receptacle is rated to hold more than 400 kg (882 pounds) and has a maximum net capacity greater than 450 L (119 gallons) then your receptacle is considered a bulk packaging even if your receptacle weighs less than 400 kg (882 pounds) at the time of shipment. The bulk packaging definition is based on the capacity of your receptacle, not on the actual amount contained therein at the time of shipment.

I hope this satisfies your request.

Sincerely,

John A. Gale
Transportation Regulations Specialist
Office of Hazardous Materials Standards



98-0313

BAH
\$ 171.8 Bulk Pkg
New Village Industrial Park
60 Commerce Drive
Buffalo, New York 14218-1040

HAZARDOUS MATERIALS SERVICES.....TRANSPORTATION.....TRAINING...CONSULTING

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October 16, 1998

Ed Mazzullo, Director
Office of Hazardous Materials Standards
DOT/RSPA
400 7th Street SW
Mail Stop DHM-10
Washington, D.C. 20590

CERTIFIED NO.: P518920778

Dear Mr. Mazzullo:

The purpose of this correspondence is to request written clarification of the definition for "bulk packaging" as defined in 49 CFR 171.8(2) as a receptacle for a solid.

My understanding is that a solid receptacle with a maximum capacity greater than 450 L (119 gallons) that is also capable of weighing more than 400 kg (882 pounds) but may actually weigh less than 882 pounds at the time of shipment is considered a bulk package.

If you have any questions regarding this matter, please contact me at (716) 827-7200. I appreciate your assistance.

Sincerely,

Nancy J. Coppelin
Director of Compliance

cc: D. Dintino