



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

AUG 15 2001

Mr. Marc Richardson
QA Manager
Taylor-Wharton
4075 Hamilton Blvd.
Theodore, AL 36582

Ref. No. 01-0166

Dear Mr. Richardson:

This is in response to your June 27, 2001 letter and subsequent phone conversations with Diane LaValle of my staff concerning manufacturing changes to UN specification 1A1 drums under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask what regulations apply to modifying a stock of already manufactured UN 1A1 drums by reducing the height of the top skirt by four inches according to the sketches you provided. Both configurations have been design qualified under the HMR.

You may modify your existing drums from a tested design type to a similar, but shorter, design type without the need for additional testing as long as the modification will not reduce the structural integrity of the certified drum and the manner of construction for the modified drums is the same as for the tested design type. In addition, drum markings must accurately reflect the modified drums.

I hope this satisfies your request.

Sincerely,

Edward T. Mazzullo
Director, Office of Hazardous
Materials Standards

Johnsen
\$ 178.601
Testing
01-0166



Taylor-Wharton

Harsco

FAX TRANSMITTAL

4075 Hamilton Blvd.
Theodore, AL 36582 USA
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TO: Mr. Donald Burger
US DOT/ RSPA/ OHMS/ DHM-22.1
FAX NUMBER: (202) 366-3650
FROM: Marc Richardson, Taylor-Wharton
DATE: June 27, 2001
PAGES (including cover): 1
SUBJECT: DOT Interpretation of 49 CFR Requirements

Dear, Mr. Burger,

Ron Lambert, of Taylor-Wharton, contacted you last week concerning UN 1A1 cylinders that have been manufactured by Taylor-Wharton. In 1996 we changed the design by lowering the overall height by 5 inches. We now have a request from our customer to reduce the height of cylinders we built before the design change. We have a few questions concerning this modification of UN 1A1 cylinders. *drums*

Do we need to apply DOT Variation #3 or can we modify these old cylinders to match our latest approved design? *drums*

After the modification, do you leave on the current dataplate or do we need to use new dataplates that are required on our latest approved design?

What type of testing is required; completed design validation tests or just the period retesting?

Please reply by July 6, 2001 if possible.

Respectfully,

Marc Richardson
Marc Richardson
QA Manager

CC: Ron Lambert, Senior Proposal Engineer, Taylor-Wharton

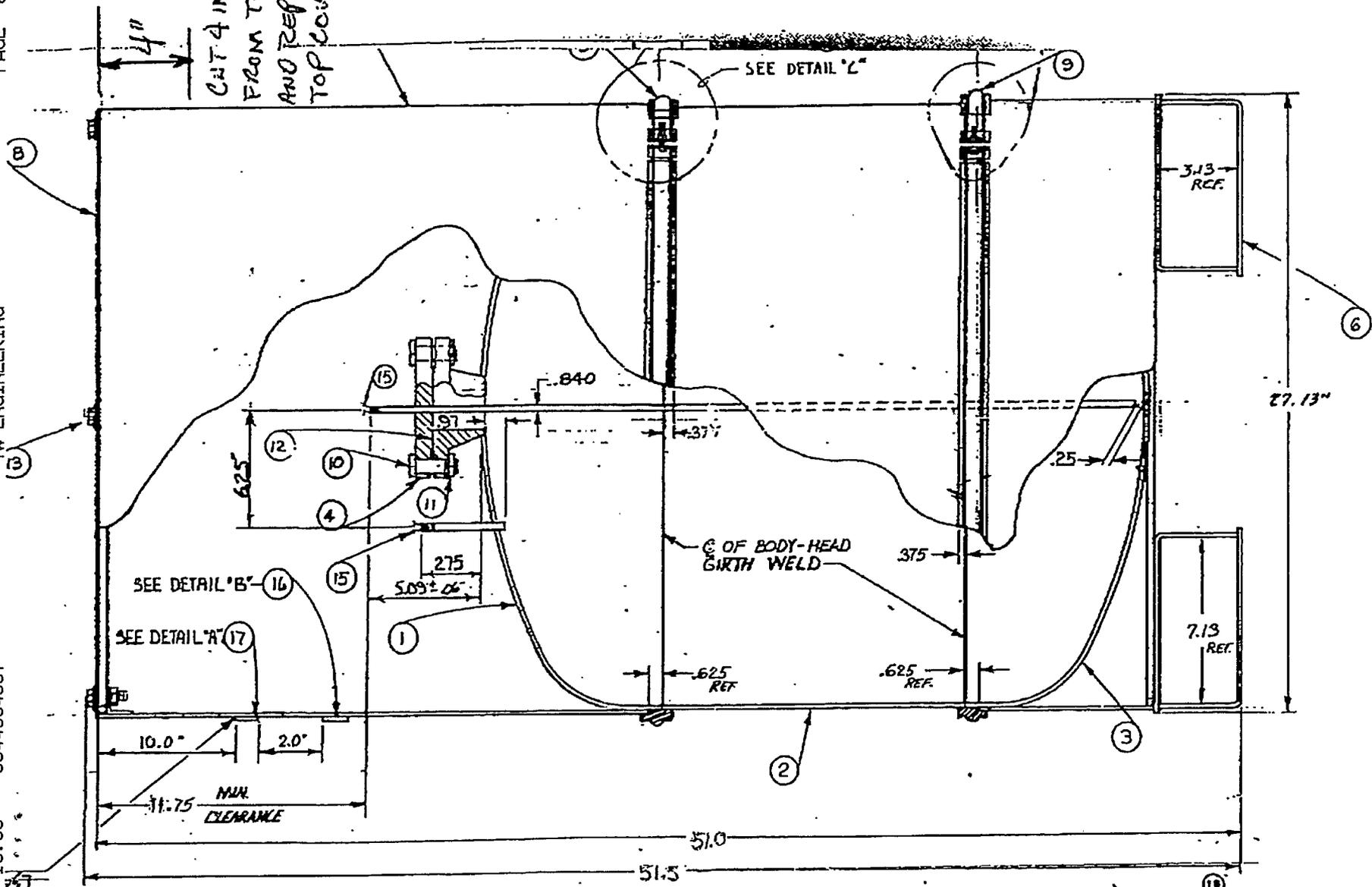
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Harsco Corporation Gas and Fluid Control Group

CUT 4 INCHES FROM TOP SKIRT AND REFLACE TOP COVER



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TYP. 8 0.01

REF