



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

1200 New Jersey Avenue, SE  
Washington, DC 20590

August 1, 2023

Mr. Travis Hillmer  
General Manager  
Haz-Mat One  
1203 C South Parker Rd  
Olathe, KS 66061-4200

Reference No. 22-0036

Dear Mr. Hillmer:

This letter is in response to your April 29, 2022, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the use of salvage drums used to transport leaking packages containing Packing Group (PG) I (great degree of hazard) hazardous materials.

We have paraphrased and answered your questions as follows:

- Q1. You ask whether PG I packages found to be leaking in transportation—containing PG I hazardous materials—may be placed in a PG III (minor degree of hazard) (“Z” rated) salvage drum.
- A1. Packages of hazardous materials that are damaged, defective, or leaking; packages found to be not conforming to the requirements of the HMR after having been placed in transportation; and hazardous materials that have spilled or leaked may be placed in a metal or plastic removable head salvage drum that is compatible with the lading and shipped for repackaging or disposal under the conditions as specified in § 173.3(c). In accordance with § 173.3(c)(1), the drum must be a UN 1A2 (removable head steel drum), 1B2 (removable head aluminum drum), 1N2 (removable head metal (*other than steel or aluminum*) drum), or 1H2 (removable head plastic drum), tested and marked for PG III (minor degree of hazard) (“Z” rated) or higher (i.e., “X”, “Y”, or “Z” rated) performance standards for liquids or solids and a leakproofness test of 20 kPa (3 psig).
- Q2. You ask whether a PG II (“Y” rated) or PG III (“Z” rated) salvage drum is authorized for the transportation of PG I, PG II, or poisonous by inhalation (PIH) hazardous materials packages found to be leaking or damaged in transportation.

A2. The answer is yes. See answer A1.

Q3. You ask if a PG I package is placed in a salvage drum due to a leak or damage, whether the salvage drum must be rated for PG I ("X" rated) or may it be tested and marked for PG II ("Y" rated) or PG III ("Z" rated).

A3. See answer A1.

I hope this information is helpful. Please contact us if we can be of further assistance.

Sincerely,



T. Glenn Foster  
Chief, Regulatory Review and Reinvention Branch  
Standards and Rulemaking Division

Pollack

**From:** [Raynor, T'Mia \(PHMSA\)](#)  
**To:** [Hazmat Interps](#)  
**Subject:** FW: Interpretation Response Request  
**Date:** Friday, April 29, 2022 1:16:23 PM  
**Attachments:** [Salvage Drum Interpretation Request.pdf](#)  
[image003.png](#)

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22-0036

Good Afternoon,

Please see attached.

Thanks,

**T'Mia Raynor**

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US Department of Transportation  
**Pipeline and Hazardous Materials Safety Administration**  
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**From:** Travis J. Hillmer <[thillmer@haz-matresponse.com](mailto:thillmer@haz-matresponse.com)>  
**Sent:** Friday, April 29, 2022 1:09 PM  
**To:** PHMSA Website Manager <[PHMSAWebsiteManager@dot.gov](mailto:PHMSAWebsiteManager@dot.gov)>  
**Subject:** Interpretation Response Request

**CAUTION:** This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Attached is an interpretation response request pertaining to Salvage Drum requirements for damaged PGI, PGII, and PIH shipments.

Thank you for your consideration,

**TRAVIS J. HILLMER**  
**HAZ-MAT ONE**  
**GENERAL MANAGER**  
800-229-5252 EXT. 257  
[thillmer@haz-matresponse.com](mailto:thillmer@haz-matresponse.com)



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*[Haz-Mat Response, Inc. <sup>sm</sup>]*

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To whom it may concern,

I am writing to request an interpretation of the 49 CFR regulations as they pertain to the requirements for salvage drums for damaged/leaking shipments of PGI, PGII and/or PIH hazardous materials.

HMR; 49 CFR Part 173.3(c)(1):

Except as provided in paragraph (C) (7) of this section, the drum must be a UN 1A2, 1B2, 1N2 or 1H2 tested and marked for Packing Group III or higher performance standards for liquids or solids and a leakproofness test of 20 kPa (3 psig). Alternatively, a drum manufactured and marked prior to October 1, 1993 as a salvage drum, in accordance with the provisions of this section in effect on September 30, 1991, is authorized. Capacity of the drum may not exceed 450 L (119 gallons).

Three questions:

Do the regulations state that the salvage drum utilized need only meet the listed specifications and are not requiring the overpack to meet the specifications or bear the marking of an X rated salvage drum, tested and marked for Packing Group I performance standards for liquids or solids?

Would a Y and/or Z rated salvage drum, as long as the rest of the requirements of the paragraph are met, be an acceptable salvage drum for damaged/leaking PGI, PGII, and PIH shipments?

Is a salvage drum for a damaged PGI shipment required to carry an X rating, or are Y and Z rated drums sufficient as long as the other requirements in 173.3 are met?

Sincerely,

Travis Hillmer

General Manager

Haz-Mat One