



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

FEB - 7 2000

Mr. Kirk Kopitzke
Environmental Officer
Blue Grass Chemical Activity
2091 Kingston Highway
Richmond, KY 40475-5008

Ref. No. 99-0010

Dear Mr. Kopitzke:

This is in response to your letter requesting a clarification on the use of a salvage drum under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if a salvage drum marked "UN 1A2/X445/S" may be used as a single package for hazardous material solids.

Yes, a salvage drum marked "UN 1A2/X445/S" may be used as a single packaging for a hazardous material solid when it is prescribed or permitted in the non-bulk packaging section specified in column (8B) of the § 172.101 Hazardous Materials Table (HMT) for the material being packaged. As with any UN standard packaging, the packaging must be compatible with the lading (e.g., corrosivity, permeability) and, the performance level for which the packaging has been tested (e.g., packing group, gross mass) may not be exceeded. See §§ 173.24 and 173.24a.

To avoid confusion, the word "SALVAGE" marked on the drum may be removed or covered when offered for transportation under these circumstances. If a UN standard drum is to be reused, it must conform to the reuse conditions specified in § 173.28 prior to being refilled.

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



990010

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Stevens
§173.3



Blue Grass Chemical Activity

99-0010

2091 Kingston Highway
Richmond, KY 40475-5008

DSN: 745-6889

FAX: 745-6894

COMM: (606) 625-

DATE: 1-11-99

TO: Attn: Mr. Edward Magzullo - Dir of Hum Standards

FAX NUMBER: 202 366-3012

PHONE NUMBER:

FROM: KIRK KOPTZKE - ENV. OFFICER

PHONE NUMBER: 606 625 6892

REMARKS:

See attached

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Kopitzke Kirk L Unknown

To: DOT
Subject: Salvage Drums

My interpretation of the definition of 'salvage packaging' (171.8 & 173.3c) seems to imply that salvage containers may not be used as **single packaging** for non-bulk packaging of hazardous materials in Packaging groups I, II, and III. Section 173.211, 173.212, and 173.213 all authorize 1A2 for single packaging and salvage drums we have on hand have UN 1A2/X445/S marking. Are we prohibited from using these drums as single packaging of hazardous solid material in Packing group I, II or III? Is my interpretation above correct and if so why is this constraint imposed if salvage containers are manufactured to POP standards adequate to containerize a leaking liquid container and equivalent or stricter than POP standards for non-salvage 1A2 drums?