



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

MAR 15 2000

Mr. Floyd A. Whitney
President
Western Poly Drums, Inc.
8727 Rochester Ave.
Rancho Cucamonga, CA 91729-4200

Ref. No: 00-0024

Dear Mr. Whitney:

This is in response to your letter of January 25, 2000, requesting clarification of the requirements for leakproof testing of non-bulk packagings under the Hazardous Materials Regulations (HMR; 49 CFR parts 171-180). Specifically you ask whether you may follow the methods outlined in Appendix B to Part 178--Alternative Leakproofness Test Methods, as an alternative to the testing procedure required by § 178.604.

The answer is yes. As stated in § 178.604(d) Test method, "other methods, at least equally effective, may be used in accordance with appendix B of this part."

I hope this information is helpful.

Sincerely,

Delmer F. Billings
Chief, Standards Development
Office of Hazardous Materials Standards



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Hattie L. Mitchell
U.S. Department of Transportation
Research and Special Program
400 Seventh Street, S.W.
Washington, D.C. 20590

January 10, 2000

Subject: Steel drum re-con leak proof test

Dear, Hattie L. Mitchell

Western Poly Drums, Inc. is going into re-con steel drums business.

As I understand CFR 49, #173.28 & 178.604 (d) leak proof test I can use
Appendix B (2) and (3) is this correct.

We are also going to have the drums third party tested each year.

Please let me know as soon as possible if I am correct.

Floyd A Whitney
President

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