



US Department
of Transportation

**Research and
Special Programs
Administration**

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

APR 19 2000

Mr. C.L. Pettit
Vice President, Regulatory and Technical Affairs
RIPA
8401 Corporate Drive
Landover, MD 20785-2224

Ref. No. 00-0088

Dear Mr. Pettit:

This is in response to your letter of March 20, 2000, concerning performance oriented packaging markings on drums under the Hazardous Materials Regulations (HMR; 49 CFR Parts 100-180). Specifically you asked if a UN standard drum dual marked on the bottom to both a "Y" rating for liquids and an "X" rating for solids may be used for a PG I solid even though the drum is side marked with only the "Y" rating.

Section 178.3(a)(5) states that for packages with a gross mass of more than 30 kg (66 pounds), the markings or a duplicate of the markings must appear on the top or side of the package. The marking for the "X" rating would need to appear on the side of the drum if you use the packaging for that standard and your gross mass exceeds 30 kg.

I hope this satisfies your request.

Sincerely,

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



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§178.3
00-0088

March 20, 2000

Mr. Ed Mazullo
Director, Office of Hazardous Materials Standards DHM-10
Research and Special Programs Administration
U.S. Department of Transportation
400 Seventh Street, S.W.
Washington, D.C. 20590-0001

Dear Ed:

RIPA requests a written response to the question of whether new drums tested and accordingly dual-marked on the bottom to both a "Y" liquid and an "X" solid can be used for an "X" solid even though the drum is side marked with only the "Y" marking. All test records for these drums are maintained and accessible. Also, these drums reportedly meet specifications for 7 A drums.

There has been some confusion reported among certain shippers as to whether this would be an allowable practice.

RIPA appreciates your time taken to respond to this inquiry.

Sincerely,

C.L. Pettit
Vice President, Regulatory and Technical Affairs

Cc: P. Rankin
L. Bierlein
E. Lind