



U.S. Department
of Transportation
**Research and
Special Programs
Administration**

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

JUN 28 2000

Mr. Colum O'Hara
Phoenix Container, Inc.
Quality Control Department
1202 Airport Road
N. Brunswick, New Jersey 08902

Ref. No. 00-0148

Dear Mr. O'Hara:

This is in response to your letter dated May 9, 2000, requesting clarification of the drop test procedures for performance oriented packagings, such as 1A1 and 1A2 steel drums, under § 178.603 (f)(1) of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). You state that you were advised on May 8, 2000, by the Hazardous Materials Information Center that equilibrium could be reached by letting the contents of the package settle. Specifically, you ask if this is an acceptable method to reach equilibrium inside a container once it has been drop tested.

There are several acceptable methods for achieving equilibrium between the internal and external pressures of the container. These methods include: letting the package sit for a time to allow the contents of the package to settle; or by drilling a hole into the vapor or air space to achieve equilibrium in the package after the drop test.

I hope this answers your inquiry.

Sincerely,

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



000148

178-603

Phoenix Container, Inc.

May 9, 2000

Mr. Edward Mazzullo
Director of the Office of Hazardous Materials Standards
U.S. DOT / RSPA - DHM - 10
400 7th Street
SW Washington, DC 20590

Boothe
§ 178.603
00-0 148

Dear Mr. Mazzullo,
Phoenix Container, Inc., is a metal container manufacturer, which produces metal containers ranging in capacities from two gallon through six and a half gallons. A large percentage of containers produced by Phoenix Container, Inc., are performance orientated packagings including both 1A1 and 1A2 packages. This facility has obtained the Manufacturing Number-M5380 and has begun to test and certify its containers in conjunction to the Code of Federal Regulations Number 49.

Phoenix Container, Inc., formally requests clarification in regards to the drop test, Statute 178.603 (f) (1), prescribed in the 49 CFR. Specifically, this department petitions clarification in regards to how equilibrium is reached inside the container once it has been dropped.

This department had contacted the U.S. Department of Transportation, Hazardous Materials Regulations Information Center, (800) 467-4922, on May 8, 2000, at 10:40 A.M., to clarify Statute 178.603 (f) (1). Phoenix Container, Inc., specifically requested clarification in regards to how equilibrium is reached inside the container once it has been dropped. The information Phoenix Container, Inc., received from Ms. Lorena Alvarez, an Information Specialist for the U.S. DOT, suggested that equilibrium would be reached by letting the contents of the package settle. Ms. Alvarez further stated that the test is designed to see if a package is able to stand a spike in the internal pressure after it has been dropped.

Please indicate if the dropped container reaches equilibrium between the internal and external pressures if the container is left untouched and its liquid contents are allowed to settle. Your guidance and decision will be greatly appreciated. Thank you in advance for your time and cooperation in this matter.

Sincerely,



Colum O'Hara
Phoenix Container, Inc.
Quality Control Department

cc: KS

TB

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