



U.S. Department  
of Transportation

**Research and  
Special Programs  
Administration**

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

JUN 28 2000

Ms. Diedre J. Devick  
Equistar Chemicals, L.P.  
Process Research Center  
8935 North Tabler Road  
Morris, IL 60450

Ref. No. 00-0154

Dear Ms. Devick:

This is in response to your letter dated May 17, 2000 concerning specification packaging requirements for combination packagings under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically you ask if you may use a DOT specification 4B240 cylinder as an inner metal receptacle for a combination packaging authorized under § 173.213(b).

The answer is yes. A DOT specification cylinder may be used as an inner receptacle of a combination packaging provided the outer packaging has been successfully tested with the DOT specification cylinder or similar packaging as an inner receptacle.

We hope this satisfies your request.

Sincerely,

John A. Gale  
Transportation Regulations Specialist  
Office of Hazardous Materials Standards



000154

173.213

BAT  
§ 173.213  
00-0154

May 17, 2000

Mr. Edward Mazzullo  
Office of Hazardous Materials Standards  
USDOT/RSPA  
400 7<sup>th</sup> Street SW  
Washington, DC 20590

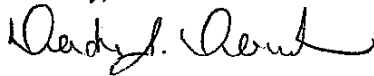
Dear Mr. Mazzullo.

I have a packaging question about a hazardous material I would like to transport. I called the office today and was told by a Hazardous Materials Transportation Senior Specialist that I could use the packaging I asked about. However, in order to document the decision in writing, I was told to write you.

The material is classified as a "Self-heating solid, inorganic, n.o.s., 4.2, UN3190, III." According to § 173.213, the authorized inner packagings include glass, plastic and metal receptacles and glass ampoules. *May I use a metal cylinder that is not under pressure as a metal receptacle?* According to § 171.8, a receptacle "means a containment vessel for receiving and holding materials, including any means of closing." My "cylinder" meets this definition and I believe the reason it is not specifically listed as an authorized inner packaging is because cylinders are typically used for gases and liquids, not solids. My material is a solid. The "cylinder" has a 3-inch diameter with a maximum capacity of 275 ml. It was purchased from Aldrich and has DOT-4B240 stamped on it.

I would greatly appreciate your response on this matter. Please fax me your decision as soon as possible and follow-up with a written copy. I thank you in advance for your cooperation. If you have any further questions, please feel free to contact me.

Sincerely,



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