



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

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

AUG 18 2000

Mr. Tom Leftwich
Black Forest Marketing, LLC
24 Vardy St. Suite 101-D
Greenville, SC 29601

Ref. No. 00-0219

Dear Mr. Leftwich:

This is in response to your August 8, 2000 letter regarding 49 CFR 178.504. Specifically, you ask if a closed head drum that is manufactured with a 3 inch opening meets the requirements of §178.504(b)(5).

Section 178.504(b)(5) states that openings in the bodies or heads of non-removable head (1A1) drums may not exceed 7.0 cm (3.0 inches) in diameter. As specified in § 171.10(a), the SI (metric) unit is the regulatory standard. A U.S. standard or customary unit appearing in parentheses following the SI unit is provided for information only and is not intended to be the regulatory standard. Therefore, 7.0 cm, not 3.0 inches is maximum opening allowed on a UN 1A1 steel drum. Using the conversion factor in § 171.10(c) for length, a more precise U.S. standard measure would be 2.7559 inches.

I hope this information is helpful.

Sincerely,

Thomas G. Allan
Senior Transportation Regulations Specialist
Office of Hazardous Materials Standards



000219

178.504



**Black
Forest
Marketing, LLC**

Gale

§ 178.504(b)(5)
Marking/Steel Drums
00-0219

Mr. Edward Mazzullo
Director, Office of Hazardous Materials Standards
400 7th St. S.W.
Washington, DC 20590

August 8, 2000

Dear Mr. Mazzullo,

I would like to receive an interpretation from your office regarding *Standards for steel drums*, section 178.504 of 49CFR. I am particularly interested in section 178.504(b)(5) regarding the opening size of 1A1 drums – 7.0 cm vs. 3 inches – and how this may effect products manufactured in the US and in Europe.

Presently, there are US manufacturers fabricating and marking containers UN1A1 with a 3" opening. This contradicts section 6.1.4.1.5 of the UN *Orange* book. These vessels are being sold into the chemical industry for global distribution of hazardous materials. Is it not illegal to mark vessels UN1A1 with openings larger than 7.0 cm (2.755 inches) as indicated in the UN *Orange* book, as well as 49 CFR? Please refer to your letter to Mr. Robert Johnson of Florida Drum dated January 6, 1995; it states that the metric unit is the regulatory standard. Also, is it legal to ship containers marked UN1A1 with a 3" opening outside the US?

We represent a European container manufacturer and would like to import product into the US. This manufacturer will only mark vessels with a 7.0 cm or less opening UN1A1; anything greater than 7.0 cm will be marked UN1A2. Attempting to mark vessels UN1A1W with a 3" opening is not permissible, according to our European UN competent authorities. What is your interpretation on this issue?

We would like to offer our domestic customers a product that can legally be used in the US, as well as globally. We appreciate your assistance and consideration in this matter, and look forward to your reply.

Sincerely,

Tom Leftwich
Black Forest Marketing, LLC