



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

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

OCT 18 2001

Mr. Jay Jarvis
Vopak USA, inc.
334 Worth Street
Fayetteville, NC 28304

Ref. No. 01-0177

Dear Mr. Jarvis:

This responds to your July 13, 2001 letter requesting clarification on cleaning and testing a UN 1H1 drum for reuse under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask whether your new air pressure test satisfies requirements for reuse of packagings in § 173.28.

You have developed your own pressure testing machine that will apply 3 psi of air and hold it for the specified time frame. You want to air pressure test your drums in order to make them acceptable for reuse for transporting hazardous materials on common carriers.

Based on the information provided in your letter, it is the opinion of this Office that your new method of pressure testing conforms to Appendix B to Part 178 - Alternate Leakproofness Test Methods and with the reuse provisions in § 173.28(b). However, leakproofness testing at 3 psi will only be suitable for drums marked for PG II or PG III liquids; PG I materials require a leakproofness test conducted at 7 psi.

I hope this answers your inquiry.

Sincerely,

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

173.28

Vopak USA Inc.
334 Worth Street
Fayetteville NC 28304
Fax: 910 483-1557
Phone: 910 483-2107

facsimile transmittal

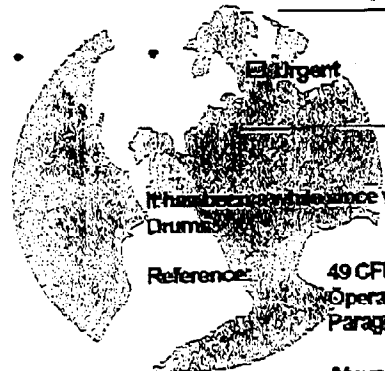
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§ 173.28
Reuse
01-0177

To: Mr. Edward Mazullo Fax: 202-366-3012

From: Jay Jarvis- Operations Manager Date: 7/13/2001

Re: DOT Drum Testing Question Pages: 1

CC: Gary Tony- SE Operations Manager



Urgent

For Review

Please Comment

Please Reply

Please Recycle

It has been my pleasure we have spoken but I have a real good question concerning the Testing of UN 1H1 Poly Drums.

Reference: 49 CFR 1910.173.28- Reuse, Reconditioning and Remanufacture of Reconditioning Operations.
Paragraph: (b)(2)- (b)(2)(ii)

Situation: At present we are cleaning our own 55/15 gallon poly drums in accordance with: 49 CFR 1910.173.28 Paragraphs (b)(7) through (b)(7)(I-iv B). Refilling with the same type products and transporting on our own trucks or contracted carriers. All containers being Packing Group II or III.

Question: We want to do Air Pressure Testing of our containers in addition to cleaning as prescribed in paragraphs (b)(2) through (b)(2)(ii). What are the current, up to date requirements in order to do this?

Our Plan: We have developed our own Pressure Testing Machine which will apply (3) psi of air and hold it for the specified time frame. (General industry standard is: 30 seconds) This will be told to us through an air pressure gauge and a clock. All pass and fail records will be kept manually on a daily basis. The container will be properly marked in accordance with: paragraph (b)(2)(ii) if it passes, if it fails it will be marked with an "X" and properly destroyed. After cleaning all containers will have to pass through this Air Pressure Testing Machine.

Please advise if "Our Plan" will meet the current requirements for Reuse- DOT Certification of a UN 1H1 poly container so the container, filled with a hazardous chemical can be shipped on common carriers.