



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

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

JUL 10 2002

Mr. H. Perry Hock
gh Package & Product Testing and Consulting, Inc.
325 Commercial Drive
Fairfield, OH 45014

Ref. No. 02-0148

Dear Mr. Hock:

This is in response to your May 26, 2002 letter concerning UN specification packaging testing under the Hazardous Materials Regulations (HMR; 49 CFR, parts 171-180). Specifically, you request clarification on the testing for UN 1A2 drum designed with and without a gasket between the lid and the drum. You ask if the six required drops for the drop test in § 178.603 could be performed on the drums and lids without the gasket, then perform three additional top diagonal drops on previously untested drums with the lids containing the gasket. You would then certify the drum as not having a gasket and the drum would also have an alternative closure with a gasket.

Steel drums with and without a gasket would be considered to be different packagings under § 178.601(c)(4) and § 178.601(g)(8). Thus, you would have to perform separate drop tests on the two types of drums you wish to manufacture to UN specifications. In answer to your follow-up question asking if closed head drums having alternate bung caps could be tested in the way you proposed, if you meet the provisions of § 178.601(g)(5) (Variation 5), then only the requirements of that section need apply. If your change in bung caps does not meet the requirements under Variation 5 then that package would be considered a different packaging under § 178.601(c)(4) and § 178.601(g)(8) and would require the full drop test in order to be a UN Specification packaging.

I hope this satisfies your request.

Sincerely

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



**gh Package
& Product
Testing and
Consulting, Inc.**

325 Commercial Dr.
Fairfield, OH 45014

Phone (513) 870-0080
Fax (513) 870-0017

335 W. Melinda Lane
Phoenix, AZ 85027

Phone (623) 869-8008
Fax (623) 869-8003

May 26, 2002

To: Mr. Edward T. Mazzullo
Director, Office of Hazardous Materials Standards
U.S. DOT/RSPA (DHM-10)
400 7th Street S.W.
Washington, DC 20590-0001

Johnsen
§ 178.603
Testing
02-0148

From: Mr. H. Perry Hock
Technical Director
gh Package & Product Testing and Company
325 Commercial Dr.
Fairfield, OH 45014

Subject: Non - Bulk Single pack testing pursuant to CFR 49, §178.603 - Drop Test

Dear Mr. Mazzullo,

I have a question regarding CFR 49, §178.603 for non-bulk single packs. The question pertains to primarily single packs of drums, and jerricans. The regulations state that six of each design type must be tested. Three drums to be dropped on the top diagonal chime, and three drums to be dropped on the weakest part not previously tested by the first drop.

The manufacturer wishes to have a 1A2 (open head steel drum) certified with and without a gasket between the lid and the drum.

Can one perform the six required drops on the drums and lids without the gasket, and then perform three additional top diagonal drops on previously untested drums with the lids containing the gasket? The drum would then be certified as not having a gasket and the drum would also have an alternate closure with a gasket.

This would save drum manufacturers great expense in not having redundant bottom or side drops since the drum itself has not changed.

Along the same thought lines, would the same interpretation be made for closed head drums having alternate bung caps?

I look forward to your response. If you need clarification or have questions regarding this letter, please call me at 513.870.0080 x 103

Yours Truly,

H. Perry Hock
Technical Director
gh Package & Product Testing and Consulting, Inc.

HPH/hph