



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

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

JUN 13 2003

Mr. T.L. Nebrich, Jr.  
Technical Director  
Waste Technology Services, Inc.  
640 Park Place  
Niagara Falls, New York 14301

Ref. No: 03-0077

Dear Mr. Nebrich:

This is in response to your March 10, 2003 letter requesting clarification regarding the weight limits per container for single packages, lab packs and salvage drums under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically you ask whether you may exceed the maximum density for any liquid in a liquid tested, single package. You state that you recently read in a newsletter that the maximum density for any liquid in a liquid tested, single package may not be exceeded. You further stated that this would also apply to lab packs and salvage drums.

A shipper may offer for transportation a single or composite non-bulk packaging containing a liquid hazardous material with a specific gravity greater than that marked on the packaging provided the conditions prescribed in § 173.24a(b)(1)(i) through (iii) are met. For lab packs you may not exceed a maximum gross mass of 205 kg as stated in § 173.12(b)(2)(v). For salvage drums, you may not exceed the maximum gross mass marked on the outer packaging or salvage drum.

I hope this satisfies your request.

Sincerely,

Hattie L. Mitchell, Chief  
Regulatory Review and Reinvention  
Office of Hazardous Materials Standards



030077

173.3, 173.12



WASTE TECHNOLOGY SERVICES INC.

March 10, 2003

Be HS  
§173.3  
§173.12(b)  
Applicability  
03-0077

Mr. Edward Mazzullo  
Director of Office of Hazardous Material Standards  
US Department of Transportation - RSPA (DHM - 10)  
400 Seventh Street, S.W.  
Washington, DC 20590-0001

Dear Mr. Mazzullo:

I am writing to request an interpretation regarding the package limits per container for labpacks salvage drums. I recently read a newsletter, which stated:

*... you cannot exceed the maximum density for any liquid in a liquid tested, single package. This even includes labpacks and salvage drums. For example, a UN1A2/Z1.4/200/... is only authorized for a maximum solution density of 1.4 SpGr. This applies even if the configuring the package with inner receptacles. An inner receptacle containing a solution with a SpGr above 1.4 will render the package out of compliance with the regulations, regardless of the amount of this solution in the package.*

Is this true? I've done some research (i.e., DOT Hotline, and 49 CFR) and I can't seem to verify this statement. The author said it was one sentence from a DOT guidance letter, which was discussing a different topic all together. Unfortunately he cannot find that letter. If this is true, please include the citation of the infamous letter. If it not true, also indicate citation.

If you have any further questions, please do not hesitate to contact me.

Very truly yours,  
WASTE TECHNOLOGY SERVICES, INC.

T.L. Nebrich, Jr., CHMM, QEP, REM  
Technical Director

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