



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

FEB 25 2008

1200 New Jersey Avenue, SE
Washington, D.C. 20590

Mr. David Hiromura
President
NRS Logistics
10 Bank Street Suite 1110
White Plains, NY 10606

Ref. No. 08-0017

Dear Mr. Hiromura:

This responds to your letter regarding the use of cylinders for the packaging of toxic by inhalation liquids under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask whether DOT 4BA240 cylinders with a water capacity of 47.6 lbs and DOT 4BW225 or 4BW240 cylinders with water capacities ranging from 143 lbs to 1,000 lbs are authorized for Division 6.1, Hazard Zone B liquids under §§ 173.40 and 173.227 of the HMR. In addition, you ask what is considered "sufficient outage" as specified in § 173.40(b) for Hazard Zone A and Hazard Zone B materials.

The answer to your first question is yes. Both non-bulk cylinder specifications are authorized for the materials described in your letter. For your information, a cylinder is considered a bulk packaging only when it has a water capacity greater than 1000 lbs. See § 171.8.

With regard to your second question on "sufficient outage," a shipper or filler must consider the coefficient of thermal expansion for the material to be packaged and limit the fill at room temperature so that it will not expand and the cylinder become liquid full at 55 °C (131 °F).

I trust this satisfies your inquiry. Please contact us if we can be of further assistance.

Sincerely,

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



FMC License No. 3563

5 December 2007

Stevens
§173.40
§173.227
Cylinders
08-0017

Mr. Charles Hochman
Director
Office of Hazardous Materials Technology
U.S. Dept. of Transportation, PHMSA
1200 New Jersey Ave., SE East Bldg, 2nd Fl.
Washington, DC. 20590

Dear Charles:

Re: Cylinders for carriage of PIH, 6.1, PG I, Zone B materials

This is to request a Letter Of Interpretation regarding shipments in DOT cylinders. Our customer is planning to shipe UN1580, 2644, 3382 & 3390, all PIH, 6.1, Zone B materials. Additionally, UN 3390 has a sub risk 8. These four products are all liquids and will be shipped in the following DOT cylinders:

	Working Pressure	Test Pressure	Water Capacity
1. 4BA240	240 psi	480psi	47.6 lbs.
2. 4BW240	240	480	143.0
3. 4BW240	240	480	239.0
4. 4BW225	225	450	1,000.0

Can you confirm that:

- 1) In accordance with 173.227 and 173.40, cylinders shown as 1, 2 & 3 above are acceptable packagings for these four products.
- 2) Cylinder 4 above has a WC of 1,000 lbs which converts to a liquid capacity of 453.59 L. With a capacity greater than 450L, technically it is a bulk packaging. Even though it is technically a bulk packaging, the non-bulk packaging regulations in 173.227 and 173.40 still apply and allow this cylinder to be used to carry these four products.

Thank you for your kind attention to this matter.

Sincerely,

David Hiromura
President

Drakeford, Carolyn <PHMSA>

From: Mitchell, Hattie <PHMSA>
Sent: Tuesday, January 15, 2008 7:30 AM
To: Drakeford, Carolyn <PHMSA>
Subject: FW: URGENT RE-SEND: Letter of Interpretation
Attachments: Interpretation 071205 cylinder capacity.DOC

Please log in.

From: Hochman, Charles <PHMSA>
Sent: Monday, January 14, 2008 2:38 PM
To: Mitchell, Hattie <PHMSA>
Cc: Hochman, Charles <PHMSA>
Subject: FW: URGENT RE-SEND: Letter of Interpretation

Hattie:

I am not sure if I ever sent this to you. David called looking for an answer. On a quick read what he is asking is fine.

Charlie

From: DAVID [mailto:dhiromura@nrslogistics.com]
Sent: Wednesday, December 05, 2007 5:44 PM
To: Hochman, Charles <PHMSA>
Cc: dmasi@nrslogistics.com; 'Toth, Szilvia'
Subject: URGENT RE-SEND: Letter of Interpretation

Charlie – Somehow an old letter got attached to my previous message. This is the correct attachment.

Thanks, David

Charlie,

Just following up on our conversation. Attached is a request for a written reply confirming that we can use WC#1000 cylinders to carry PIH, 6.1, PG I Zone B materials.

Thanks,
David

PLEASE NOTE MY NEW EMAIL ADDRESS: dhiromura@nrslogistics.com