



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

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

FEB 10 2014

Mr. Kevin Greene
Hazardous Materials Consultant
DuPont Global Logistics
P.O. Box 525
Axis, AL 36505

Reference No.: 13-0209

Dear Mr. Greene:

This is in response to your November 5, 2013 letter and conversation with a member of my staff requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically you ask if the HMR authorize the installation of a 2 inch bung/vent into a UN 1H1 plastic drum that would permit air to enter the drum, but not allow the release of hazardous material from the drum. You note that the drum will be fitted with the bung/vent prior to subjecting it to the tests specified in Part 178.

The HMR authorize openings for filling, emptying or venting in UN 1H1 plastic drums in accordance with the provisions of § 173.24(g). Please note that except for shipments of cryogenic liquids as specified in § 173.320(c) and of carbon dioxide, solid (dry ice), venting of packages is not permitted when transportation by aircraft is involved. When venting is authorized, provided the drum passes the appropriate design tests with the bung/vent in place and does not allow the escape of hazardous material, the opening described in your letter is acceptable.

I hope this information is helpful. If you have further questions, please do not hesitate to contact this office.

Sincerely,

Duane Pfund
International Standards Coordinator
Standards and Rulemaking Division

Leary
§173.24(g)(1)(2)(3)
Packages

13-0209

DuPont Global Logistics
P.O. Box 525
Axis, Alabama 36505



DuPont Global Logistics

05 November 2013

Mr. T. Glenn Foster
Chief, Regulatory Review and Reinvention Branch
Standards and Rulemaking Division
Attn: PHH-10
East Building
1200 New Jersey Avenue, SE.
Washington, DC 20590-0001

Request a written formal interpretation regarding the use of vents on plastic 1H1 drums as provided in 173.24(g)(1)(2)(3) of the HMR.

Dear Mr. Foster:

I have a 55-gallon plastic drum (1H1/Y1.9/150) that will be used to transport a class 9 liquid (Marine Pollutant) by sea and air. The drum will be fitted with a 2" bung/vent that will allow air to enter the drum but will not allow any liquid or gas to exit the drum. The purpose of the vent is to allow air to enter the drum to avoid drum paneling (e.g. slight sucking-in or collapsing) of the plastic drum body due to methyl soyote scavenging air from the head space.

Based on my understanding of the provisions provided in part 173.24(g)(1)(2)(3) of the HMR, I may install a vent on my plastic drum that will allow air to enter the plastic drum but will not permit any hazardous (i.e. poisonous, flammable) liquid or gas to exit the drum. Is my understanding correct?

I hope this information is helpful. Please contact me if you require additional assistance.

Kevin M. Greene
Hazardous Materials Consultant
DuPont Global Logistics
P.O.Box 525
Axis, Alabama 36505
Phone: (251) 679.5330
Kevin.m.greene@dupont.com