



U.S. Department  
of Transportation

Pipeline and Hazardous  
Materials Safety  
Administration

1200 New Jersey Avenue, SE  
Washington, DC 20590

MAY 25 2017

John J. Blum  
Director, Technical Services  
Ball Food & Aerosol  
9343 W. 108th Circle  
Westminster, CO 80021

Reference No. 17-0028

Dear Mr. Blum:

This letter is in response to your March 21, 2017, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the wall thickness of Department of Transportation (DOT) Specification 2P and 2Q inner non-refillable metal receptacles.

We have paraphrased and answered your questions as follows:

- Q1. You ask how wall thickness is defined and if it denotes the thickness of the steel substrate or the combined thickness of the steel and any applied polymeric liners.
- A1. Wall thickness is the thickness of the material as specified in §§ 178.33-5 and 178.33a-5 for DOT Specification 2P and 2Q containers, respectively. This does not include any applied polymeric liners that may be added.
- Q2. You ask if and/or when rounding up the wall thickness measurement is allowed. You further provide an example asking if a wall thickness measured at 0.0066 inch meets the 0.007-inch requirement for DOT Specification 2P containers.
- A2. Section 178.33-7 states, "The minimum wall thickness for any container shall be 0.007 inch." Therefore, rounding up is not acceptable as the wall thickness would not meet the minimum requirement.

I hope this information is helpful. Please contact us if we can be of further assistance.

Sincerely,

T. Glenn Foster  
Chief, Regulatory Review and Reinvention  
Standards and Rulemaking Division

**Goodall, Shante CTR (PHMSA)**

Wolcott  
178.33  
Specification  
17-0028

**From:** INFOCNTR (PHMSA)  
**Sent:** Tuesday, March 21, 2017 2:30 PM  
**To:** Hazmat Interps  
**Subject:** FW: Request for formal Letter of Interpretation

Hi Shante/Alice,

Please submit this as a letter of interpretation. Please let me know if you have any questions.

Thanks,  
Jordan

**From:** Blum, John J (John) [mailto:JBLUM@BALL.COM]  
**Sent:** Tuesday, March 21, 2017 10:38 AM  
**To:** INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>  
**Subject:** Request for formal Letter of Interpretation

I have two questions that I'd like a formal answer on from DOT. It applies to 49 CFR 178.33 and 178.33a - specifically section 7 - wall thickness.

Question 1: How is wall thickness defined? For example, if you have a container manufactured with a steel substrate coated with a polymeric liner (either inside or outside or both), is the wall thickness the thickness of the steel substrate or the combined thickness of the steel and any applied polymeric liners?

Question 2: Thickness for DOT-2P and DOT-2Q are .007 and .008" respectively in 178.33(7) and 178.33a(7). If the minimum wall thickness is measured at .0066", does this qualify as .007" for DOT-2P? When is rounding up allowed or not allowed?

Respectfully Submitted,

John  
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