



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

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

AUG 15 2001

Mr. Marc Richardson
QA Manager
Taylor-Wharton
4075 Hamilton Blvd.
Theodore, AL 36582

Ref. No. 01-0166

Dear Mr. Richardson:

This is in response to your June 27, 2001 letter and subsequent phone conversations with Diane LaValle of my staff concerning manufacturing changes to UN specification 1A1 drums under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask what regulations apply to modifying a stock of already manufactured UN 1A1 drums by reducing the height of the top skirt by four inches according to the sketches you provided. Both configurations have been design qualified under the HMR.

You may modify your existing drums from a tested design type to a similar, but shorter, design type without the need for additional testing as long as the modification will not reduce the structural integrity of the certified drum and the manner of construction for the modified drums is the same as for the tested design type. In addition, drum markings must accurately reflect the modified drums.

I hope this satisfies your request.

Sincerely,

Edward T. Mazzullo
Director, Office of Hazardous
Materials Standards



01-0166

178.601

**Taylor-Wharton****Harsco****FAX TRANSMITTAL**

4075 Hamilton Blvd.
Theodore, AL 36682 USA
Telephone: 251.443.8680
Fax: 251.408.4507
Web: www.taylorwharton.com

TO: Ms. Diane LaValle
US DOT/ RSPA/ OHMS/ DHM-3

FAX NUMBER: (202) 366-3012

FROM: Marc Richardson, Taylor-Wharton

DATE: July 18, 2001

PAGES (including cover): 2

SUBJECT: DOT Interpretation of 49 CFR Requirements, Additional Information

Ms. LaValle,

Here is the additional information required to explain our fax of June 27, 2001 concerning the modification of DOT drums.

In 1996, Taylor-Wharton changed the design by lowering the overall height of the drums for 51.50 inches to 47.50 inches. Both designs have been design tested per DOT requirements. We now have a request from our customer to modify approximately 50 drums built prior to 1996 (51.50 inch design) to the current 47.50 inch design.

The modification will require approximately 4 inches to be cut from the top shirt of the drum. This will not affect the structural integrity of the drum. I have attached a copy the drawing for your review.

Please as soon as possible.

Respectfully,


Marc Richardson
QA Manager

CC: Ron Lambert, Senior Proposal Engineer, Taylor-Wharton

___ Original correspondence will NOT be forwarded by mail

CONFIDENTIALITY NOTICE

The information in this fax is confidential and may be legally privileged. It is intended solely for the named recipient. Access to this fax by anyone else is unauthorized. If you are not the intended recipient or the employee or agent responsible for delivering the message to the recipient named, please note that any use, disclosure, copying, distribution of this fax or any action taken or omitted to be taken in reliance on it is prohibited. If you are not the intended recipient, please inform us by calling the sender at the phone number above.

Harsco Corporation Gas and Fluid Control Group