



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

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

JUN 17 2005

Ms. Cherie Walton
Reactivities Management Corporation
1025 Executive Blvd., Suite 101
Chesapeake, VA 23320

Ref. No. 05-0111

Dear Ms. Walton:

This is in response to your April 28, 2005 letter requesting clarification regarding the general packaging requirements specified under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Your questions are paraphrased and answered as follows:

Q1. Is it permissible for a specification combination package (a UN 4G fiberboard box with inner metal receptacles), which was tested for liquids, to be filled with a solid material as long as the gross mass marked on the packaging is not exceeded?

A1. Yes. A combination packaging that was tested with a liquid may be filled with a solid material provided it is an authorized packaging for the solid material and conforms to the general packaging provisions in Part 173, Subpart B.

Q2. If the answer to Q1 is yes, must the inner receptacles be used to contain the solid material?

A2. Yes. The packaging should be prepared in the same manner it was tested.

I hope this information is helpful.

Sincerely,

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



050111

173.24a (b)(3)

Message

Satterthwaite Page 1 of 1

§173.24a (b)(3)

Non-bulk Packagings
Packages

05 - 0111

INFOCNTR <PHMSA>

From: reactives@earthlink.net
Sent: Thursday, April 28, 2005 12:39 PM
To: INFOCNTR <PHMSA>
Subject: Information Center Comments/Questions

Complete by Phone, Left VM to call HMIC 4/28/2005 KAL

Below is the result of your feedback form. It was submitted by
Cherie Walton (reactives@earthlink.net) on Thursday, April 28, 2005 at 12:38:35.

Email: reactives@earthlink.net

Name: Cherie Walton

Category: Shippers-General Requirements for Shipments and Packagings (Sections 173.1 - 173.476)

Organization: Reactives Management Corp.

Street: 1025 Executive Blvd., Suite 101

City: Chesapeake

State: Virginia

Zip Code: 23320

Phone: 757-436-1033

Fax: 757-548-2808

Comments: RE: Combination packaging.

We have two sizes of combination packagings which are intended to hold liquids. Each combination packaging consists of inner metal cans (e.g. metal paint cans) with locking rings. These are packed inside a 4GY.

The markings on the outer 4Gs are as follows:

4G/Y9.6/S/04 USA/+AX4033

and

4G/Y38.5/S/05 USA/+AZ4600

According to 173.24a(b)(3), which addresses single or composite non-bulk packaging (not combination packagings), solids may be packed in non-bulk packaging which has been tested for liquids.

Can we use the above 4Gs (since they are marked with an "S") for solids as long as the gross mass in kilograms does not exceed the rated capacity of the packaging in liters?

If so, are we required to pack the solids in the approved inner receptacles (paint cans)?

Thanks for your help.

4/28/2005