



NEW AND USED CORRUGATED
PLASTIC, STEEL AND FIBRE DRUMS,
PLASTIC MATERIALS

DEPARTMENT OF
TRANSPORTATION

1987 JUN 15 PM 4:21

OFFICE OF HAZARDOUS
MATERIALS TRANSPORTATION

RELIABLE INDUSTRIES, INC.

Shipping Containers Bought and Sold

June 12, 1987

Mr. Thomas Charlton
DHL-10
United States Dept. of Transportation
RFPA
Washington, DC 20590

Dear Mr. Charlton:

As requested by Miss Mitchell of your agency, I am herein requesting information regarding the classification of empty steel drums into hazardous and nonhazardous categories. These regulations will be utilized with regard to the export shipment of crushed steel drums.

Very truly yours,

Stanley Z. Miller

6000
Q P 7-8 1

173.29

Mr. Stanley Z. Miller
Reliable Industries, Inc.
P.O.Box 4
Smoketown, PA 17576

Dear Mr. Miller:

This is in reference to your letter dated June 12, 1987, in which you requested information on how to classify empty crushed steel drums intended for export transportation.

Your letter does not specify the DOT hazard class of the residual material contained in the drums. Therefore, I am unable to provide you with any specific requirements on how the drums should be handled under this Department's Hazardous Materials Regulations (HMR) (49 CFR Parts 171-177). As provided under 49 CFR 173.29, crushed steel drums which have not been cleared and purged of all hazardous material residue must be packed in authorized packagings, and marked and labeled as required when the drums previously contained a greater amount of the hazardous material. Therefore, I strongly recommend that you obtain information on the hazard class of the residues before offering the drums for transportation or transporting the drums in your own vehicles.

I have enclosed some informational materials on our HMR. An order form to obtain these regulations is also enclosed.

Sincerely,

ORIGINAL SIGNED BY

Thomas J. Charlton
Chief, Standards Division
Office of Hazardous Materials
Transportation

Enclosures

Mitchell:dl:DHM-11:64488:8/13/87
File: 173.29
SC: 354, 382

6000
AP 1042

CONCURRENCE
RTG SYMBO D.H.M.
INITIALS/SIG PC
DATE 8/14
RTG SYMBO D.H.M.
INITIALS/SIG H.L.M.
DATE 8-14
RTG SYMBO D.H.M.
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MAGNA CORPORATION



7505 Fannin • Box 33387 • Houston, Texas 77033 • (713) 795-4270 • Telex: 76-2330 • Cable: Magna

May 27, 1981

Mr. Thomas Charlton
Standards Division
Material Transportation Board
Department of Transportation
Washington, D.C. 20590

Dear Mr. Charlton:

We at Magna in an effort to comply with Federal Regulations would like an official interpretation to an unusual situation concerning the transportation of hazardous material.

The situation is this. We are crushing steel drums for transport to a recycling facility where they will be used as scrap metal. The drums previously contained flammable liquids and were not cleaned or purged after being emptied. I would like to know what information is required on shipping papers and if labeling and placarding is required. Also are there any other precautions that need to be followed in the transportation of these drums.

My office received conflicting interpretations in phone conversations with representatives of the MTB. I would appreciate an official ruling in writing on this situation.

Respectfully,

Carlos I. Diaz
Regulatory Affairs
Specialist

CID:ljs

#4012 Qpg loft

173.29

Henry for
info

AUG 13 1981

Mr. Carlos L. Diaz
Regulatory Affairs Specialist
Magna Corporation
Box 33387
Houston, Texas 77033

Dear Mr. Diaz:

This is in response to your letter dated May 27, 1981, concerning the transportation of crushed steel drums which previously contained flammable liquids. I apologize for the delay in responding and hope it has not caused you any inconvenience.

Your letter states that the crushed steel drums are not cleaned and purged after being emptied. This being the case, the drums must be shipped as if filled in accordance with the provisions of §173.29(a). Since the drums are damaged and, perhaps leaking, they must be overpacked in either a container authorized for the material in the applicable packaging section of Part 173 or in salvage drums (see §173.3(c)). In either case, outside packages (or overpacks) must be marked and labeled (Subparts D and E of Part 172). Shipments must be placarded (see Subpart E of Part 172), if required, and described on shipping papers (Subpart C of Part 172).

I trust this satisfies your inquiry. If this Office can be of further assistance, please contact us.

Sincerely,

Original signed by

Thomas J. Charlton
Chief, Standards Division
Office of Hazardous Materials
Regulation
Materials Transportation Bureau

ETMAZZULLO:dms:DMT-211:62075:8/10/81:(W P: DIAZ)
FILE: 195/173.29
SC: 384,353,142

CONCURRENCES	
RTG. SYMBOL	DMT-21
INITIALS/SIG.	EC
DATE	8/13/81
RTG. SYMBOL	DMT-21
INITIALS/SIG.	ETM
DATE	8/12/81
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