



# OHM Newsletter

Office of Hazardous Materials

DEPARTMENT OF TRANSPORTATION / OFFICE OF THE SECRETARY / WASHINGTON, D.C. 20590

VOL. II Number 7

January 1972

## NOTICES AND AMENDMENTS PUBLISHED DURING DECEMBER

HM-93; Notice No. 71-28--Time extended for filing comments from January 4, 1972 to February 22, 1972. (36 F.R. 23931 - 12/16/71)

HM-95; Notice No. 71-31--Transportation of Blasting Caps with other Explosives by Motor Vehicle. (36 F.R. 24125 - 12/21/71)

HM-96; Notice No. 71-32--Proposed Requirements for Shipment of Etiologic Agents. (36 F.R. 25163 - 12/21/71)

Amendments -- None

Notice of Special Permits issued or denied during December 1971. (37 F.R. 493 - 1/12/72)

## ADDRESS CHANGES

In order to expedite address changes on our mailing lists containing names of persons who receive copies of Notices, Amendments, and the OHM Newsletter, please indicate your previous address as well as your current address when requesting a change.

## INCIDENT REPORTS FILED DURING 1971

During the calendar year 1971, 328 carriers submitted a total of 2,255 hazardous materials incident reports. Following is a breakdown of these reports:

<u>MODE</u>	<u>NO. REPORTS SUBMITTED</u>
3 Air Carriers.....	5
233 For-hire Highway Carriers.....	1,633
54 Private Highway Carriers.....	258
28 Rail Carriers.....	346
10 Water Carriers.....	13

## CYLINDERS NOT SUBJECT TO THE HAZARDOUS MATERIALS REGULATIONS

A cylinder having contained a Nonflammable Compressed Gas that is discharged to the degree that the pressure of the contents is less than 25.3 pounds per square inch gage at 70 degrees F. is not subject to the Hazardous Materials Regulations. The Regulations do not apply unless the pressure is 25.3 psig or over at the referenced temperature.

A cylinder being returned "empty", after having been used to ship a flammable gas, is subject to the Hazardous Materials Regulations if it contains any pressure above atmospheric. An exception to this is when the shipper of an "empty" cylinder can be sure that the quantity of gas remaining is so small that leakage cannot possibly result in an ignitable gas-air mixture. This would correspond to a percentage mixture in air below the lower flammable limit for the gas involved. We believe this situation would be very rare.

## FIRE EXTINGUISHERS

Fire extinguishers shipped under the partial exemption provisions of §173.306(c) must be tested before shipment "....to at least three times the pressure in the container at 70 degrees F. when charged and not less than 120 pounds per square inch, and before refilling and reshipping must be retested at this pressure before each shipment." (emphasis added)

It has been observed that these requirements are not being adhered to if the fire extinguishers we have examined in retail sales outlets were shipped and transported subject to the Hazardous Materials Regulations of this Department.

Shippers of these extinguishers are urged to determine that they are complying with these requirements before they certify their compliance on shipping papers in accordance with § 173.430.

## OPENINGS IN DRUMS

Several questions have been raised concerning limitations on the size of openings in drums. For example: §173.119(a)(4) specifies the use of DOT 17C drums with openings not exceeding 2.3 inches in diameter. The 17C Specifications covers both a removable (open) head and a nonremovable (closed) head configuration. A 2.3 inch limitation in Part 173 precludes use of a removable head drum. In other words, §173.119(a)(4) requires that drums with nonremovable (closed) heads must be used.

## FOREIGN PORTABLE TANKS - SPECIAL PERMITS

Petitions requesting authorization to ship certain hazardous materials (flammable liquids, combustible liquids, corrosive liquids or compressed gases) in large portable tanks (ISO type) built in foreign countries continue to receive much attention in the special permit program. Usually the petitioners are domestic water carriers, their agents, or foreign tank manufacturers or their agents. Quite often, shipper identification is not provided. Proposed shipments involve intermodal transportation necessitating approval of the U. S. Coast Guard (USCG), the Federal Highway and the Federal Railroad Administrations. Petitions often lack sufficient information or data to satisfy the criteria set forth in §170.13 or the additional criteria of the U. S. Coast Guard.

Briefly, the USCG requires descriptive data on the characteristics of each liquid chemical to be transported and complete information on the design of the tank and its venting devices. A form title "USCG Requirements for Plan Submission for Review of Portable Tanks" is available as an aid to petitioners.

For transportation by highway, the data submitted must assure that the design, construction and installation of tank appurtenances will minimize the possibility of accident damage to or failure of such appurtenances. Generally, the accident damage protection should be at least equal to the requirements of §178.340-8.

For rail movements involving the transportation of these portable tanks in trailer-on-flat-car service (TOFC), specific identification of the type of motor vehicle chassis is necessary. Also the results of any rail impact tests that may have been conducted or design calculations simulating these conditions must be provided.

If a foreign shipper is involved, issuance of a special permit for shipments transported into or within this country will be contingent upon the designation of a duly authorized U. S. domiciled agent who would be available for service or process and who would assume the responsibility of the shipper.

## OHM HAZARDOUS MATERIALS SEMINARS

The dates, locations and contacts of the January and February Seminars are listed below:

OHM Hazardous Materials Seminars Cont.

DATE AND LOCATION

Wayne State University

FOR FURTHER INFORMATION CONTACT:

Mr. F. M. Vandervegt  
Program Coordinator  
Wayne State University  
Division of Urban Extension  
25610 West 11 Mile Road  
Southfield, Michigan 48076  
PHONE: (313) 358-2104

University of Connecticut

Conference and Institutes  
Box U-56  
University of Connecticut  
Storrs, Connecticut 06268  
PHONE: (203) 429-3311 Ext. 466

*W. J. Burns*

W. J. Burns  
Director

DEPARTMENT OF TRANSPORTATION  
OFFICE OF THE SECRETARY  
Washington, D.C. 20590

Official Business

PENALTY FOR PRIVATE USE, \$300

POSTAGE AND FEES PAID  
DEPARTMENT OF  
TRANSPORTATION

