



# OHM Newsletter

Office of Hazardous Materials

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

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## NOTICES AND AMENDMENTS PUBLISHED DURING SEPTEMBER

HM-57; Notice No. 73-6 (38 F.R. 24915 - 9/11/73). This Notice of Proposed Rule Making proposes to resolve the remaining difficulties regarding classification and packaging of corrosive materials except the one involving materials corrosive only to metals.

HM-56; Amendment Nos. 170-2, 171-22, 172-21, 177-27 178-28 (38 F.R. 23791 - 9/4/73). This Amendment changes or deletes certain obsolete or incorrect references, corrects certain editorial errors in § 172.5, and corrects the address of the Secretary, Hazardous Materials Regulations Board, and the Docket room.

The closing date for filing comments in the following docket falls during October:

HM-110; Notice No. 73-5 -- October 30, 1973  
Handling of Hazardous Materials on Motor Vehicles

Notice of Special Permits issued or denied during September 1973 (38 F.R. 27854 - 10/9/73).

## ATTENTION CARRIERS: INCOMPLETE HAZARDOUS MATERIALS INCIDENT REPORTS

An unreasonably high percentage of the incident reports received from carriers fail to include adequate packaging information in Part G of the report. These incomplete reports may indicate you are accepting shipments not packaged in compliance with the Hazardous Materials Regulations.

Accurate identification is essential in order that the packagings involved may be evaluated from the compliance and suitability

Attention Carriers:  
Incomplete Hazardous Materials Incident Reports Cont.

standpoints by both the carrier and this Department. Much of the information concerning packaging trends and container performance as reported in last month's issue as well as this issue of the Newsletter was obtained from reports received.

At least one of the reasons for the lack of packaging information being supplied is that many carrier personnel involved in the inspection of damaged packages and the preparation of these reports are not sufficiently familiar with the packaging and marking requirements.

From an identification standpoint, authorized hazardous material packagings are divided into two basic categories:

1. The first category could be called "DOT Specification Packagings." These are the authorized containers for which detailed specifications are published in Parts 178 and 179 of the Hazardous Materials Regulations. These specifications normally include detailed identification marking requirements. As an example: The identification markings for a DOT 17E steel drum are detailed in section 178.116-10. The markings must include the specification number, the name or symbol of the manufacturer, as well as gage of metal used, rated capacity in gallons, and year of manufacture. The size and location of the markings are also specified. If the drum has been reconditioned or altered, additional markings required are specified in section 173.28(m). Similar marking requirements appear for other types of DOT specification packagings.
2. The second category of authorized hazardous material packagings includes all other authorized packagings not covered by detailed specifications. This group generally covers the packagings authorized for limited quantities (frequently under partial exemptions), and certain outside containers authorized to contain inside specification containers. Packagings within this category are not marked with DOT specification numbers but nearly always have container manufacturers identification displayed. These markings generally include the manufacturers name or symbol, design and test data for fiberboard boxes and barrels, gage, gallonage, and date of manufacture for steel containers.

Attention Carriers:  
Incomplete Hazardous Materials Incident Reports Cont.

Serial numbers as such seldom appear on these packagings. Accurate identification of packagings in this category is important.

A third category of hazardous materials packagings includes all other packagings not authorized by the Hazardous Materials Regulations and applicable tariffs. Complete identification of all non authorized packagings containing hazardous materials is even more important to the Department of Transportation and should be of major importance to carriers.

When dealing with leaking or damaged hazardous materials packages, carrier personnel should make every effort to obtain complete and accurate packaging identification. This information should be included in the incident report and should also be used by the carrier to determine whether or not the shipper has complied with the applicable regulations.

FEDERAL AVIATION ADMINISTRATION SUSPENDS RECENT RULE ON RADIOACTIVE SHIPMENTS

The text of public news bulletin No. 73-165, issued by the Federal Aviation Administration on September 20, 1973, is quoted below. This is an item of high interest and importance to shippers and air carriers of radioactive packages:

"The Federal Aviation Administration of the Department of Transportation announced today it is suspending a two-month old rule which specified the distance air shipments of radioactive material must be kept from any space occupied by people or animals.

"FAA took the action after receiving a letter early in August from the Department of Health, Education and Welfare stating that it supported continued air carriage of radioactive materials for medical use but suggesting that additional data was needed to further evaluate the public health aspects of the rule which was issued July 11.

Federal Aviation Administration Suspends  
Recent Rule on Radioactive Shipments Cont.

"The FAA action is in line with agency policy of continually monitoring its rules to determine the need for modifications in the interest of safety.

"The suspension takes effect October 1, 1973 and previously applicable rules will be reinstated. Further rule-making action will be based on the results of the evaluation effort by FAA and other appropriate Federal, state, and local agencies.

"Adoption of the July 11 rule was based on a Notice of Proposed Rule-Making (Notice 73-7), published in the Federal Register March 12, 1973. After carefully considering all comments received in response to the notice, FAA determined that adoption of the rule was in the public interest and would not adversely affect the safety of persons aboard aircraft.

"Transportation of radioactive materials by air is essential to the rapid delivery of short-lived radioactive drugs required for medical diagnosis and treatment and other scientific purposes. In 1972, approximately five million patients were treated with these isotopes."

The actual suspension order was published by the FAA on September 21, 1973, Docket 12574, Amendment No. 103-18 (38 F.R. 26446). Air carriers are urged to take note of the "previously applicable rules" cited above. The net result of the suspension order will be a reduction in the total number of radioactive materials packages which are permitted to be carried on almost all types of passenger-carrying aircraft, since "spacing out" of packages or groups of packages will no longer be permitted in applying the segregation distances specified in § 103.23(a).

MEMBERS OF THE OHM STAFF VISIT CONTAINER  
MANUFACTURERS AND SHIPPERS OF HAZARDOUS MATERIALS

During the past month, the following discrepancies were observed by personnel of this Office:

1. A large pail plant in Chicago was producing and embossing DOT 37A80 4-gallon pails. The gage embossment 24/26 indicated that 26-gage heads were being installed. The specification for this open-head pail calls for at least 24-gage.
2. A fiberboard box plant also in Chicago had produced a significant number of fiberboard box blanks for a major paint manufacturer, identifying them as ICC-12B-55, using 200 lb. bursting test, single-wall fiberboard. The DOT 12B-55 specification calls for at least 325 lb. bursting test, single-wall fiberboard.
3. A major steel drum manufacturer had produced several hundred 55-gallon tight-head drums embossed DOT 17C STC 18-gage. This specification requires all 16-gage.
4. Unauthorized filled and labeled steel pails and drums were observed at five major paint and coatings plants and at a large ink producer's facility. These unauthorized containers include new non specification (Rule 40) containers, reconditioned non spec. containers, containers that had been converted from 30-gallon 19-gage 17E into open heads, and reused (STC) single-trip containers not marked and identified as required.

No 29-gage 5-gallon pails are authorized as outside shipping containers for flammable liquids under the hazardous materials packaging requirements. However, an unusual number of incident reports have been received during the past several weeks concerning leaking and damaged 29-gage, 5-gallon pails without overpack in flammable liquid service. Based on the reports and on follow-up visits in the Baltimore, North Jersey, and Chicago areas, it is evident that several shippers including a number of large organizations are presently using this type container.

Shippers are cautioned concerning the use of such containers from both the legal and safety standpoints.

## LEAKING CAP CLOSURES

Loose, broken and/or defective bottle caps continue to appear frequently on incident reports as a cause of unintentional release of hazardous materials. The reports include both glass and polyethylene bottles up to one gallon capacity and various classes of hazardous materials. DOT investigations so far indicate a variety of causes:

1. Caps applied by both machines and employees are either too loosely fitted or over-tightened thus stripping threads or otherwise damaging the closure.
2. Some cap designs as well as certain materials are such that "normal" transit vibration causes back-off of the caps.
3. Some package designs permit excessive movement of the bottles within the outer container which also encourages cap back-off. The use of the proper size outer container, separators, cushioning and/or pads can all help reduce this problem.

As far as can be determined, the packagings involved in these incidents show no signs of external damage and apparently have been subjected only to "conditions normally incident to transportation." When shippers follow the provisions of section 173.24. "Standard requirements for all packages," few cap problems occur.

## REMINDER -- HAZARDOUS MATERIALS SEMINARS IN NOVEMBER

The Office of Hazardous Materials and the Federal Aviation Administration would like to remind you of the one-day seminars scheduled for November. These seminars are on the transportation of hazardous materials by air.

The dates and contacts are as follows:

Cleveland -- November 1, 1973      Minneapolis -- November 6, 1973

## Reminder - Hazardous Materials Seminars in November Cont.

Mr. Carl Sheldon or  
Mr. George Brice  
DOT/FAA AGL-FSDO-65  
Cleveland Hopkins Airport  
Cleveland, Ohio 44135  
TELEPHONE: (216) 522-4331

Mr. L. Hauser  
DOT/FAA AGL-ACDO-34  
6201 34th Avenue South  
Minneapolis, Minnesota 55450  
TELEPHONE: (612) 725-3361

If you plan to attend these seminars, it is suggested that you contact the coordinators as soon as possible so that all plans can be completed.



W. J. Burns  
Director  
Office of Hazardous Materials

The Secretary of Transportation has determined that publication of this periodical is necessary in the transaction of the public business required by law of this Department. Use of funds for printing this periodical has been approved by the Director of the Office of Management and Budget through November 30, 1976

DEPARTMENT OF TRANSPORTATION

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