

Skolnik Industries, Inc.  
4900 S. Kilbourn Ave.  
Chicago, IL 60632 USA

## SKOLNIK STEEL CONTAINERS + PACKAGING

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### PRODUCT NOTIFICATION

**TO:** Customers of Skolnik Industries, Inc.  
**FROM:** Howard Skolnik  
**DATE:** 09 February 2007  
**SUBJECT:** APPROVAL OF EQUIVALENT PACKAGING

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To our Customers,

We wish to inform you that for a portion of 2006, the UN Certifications for some of our drum products were issued with an incomplete Stack Test. As part of the UN Performance Oriented Standards, the Stack Test is a non-destructive test in which a specified mass (weight) is placed on top of 3 drums for 24 hours. The test is successful if there is no leakage or signs of deformation on the drum. To date, Skolnik has never experienced a Stack Test failure. For each UN Certification a full Design Qualification Test sequence is performed. Carbon steel drums require 3 test samples while stainless and 7A require one. During a portion of 2006, a single test was performed for carbon drums, therefore, the carbon drums were missing 2 test samples.

The requisite tests, with successful results, have now been completed and the US Department of Transportation has issued Skolnik an Approval of Equivalent Packaging (see attachment), which recognizes these drums as being equivalent to those having had a three-sample stack test. This Approval covers drums manufactured in between 25 April 2006 to 08 February 2007. Since these drums had passed the full Stack Test in previous years, and since successful 7A testing demonstrates that similar gauge drums can withstand weights exceeding those required by the UN, the DOT issued an approval that the drums will perform to the full test levels indicated on the Test Certifications.

Customers that have purchased UN 1A1 or 1A2 drums that are covered by this Approval, and still have these drums in their possession, need to keep a copy of the attached Approval at all shipping points. It is not necessary to change any marking on the drums nor show anything on the shipping papers, just maintain the copy of the Approval until the affected drums are out of your distribution system.

The attached list indicates the Skolnik Product Numbers that are included in the Approval of Equivalent Packaging. If you wish to discuss this approval further, please contact:

Dean Ricker, VP Sales	<a href="mailto:dean@skolnik.com">dean@skolnik.com</a>	773.362.1910
Gary Fischer, Director of Quality	<a href="mailto:gary@skolnik.com">gary@skolnik.com</a>	773.362.1940
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Howard Skolnik, President	<a href="mailto:howard@skolnik.com">howard@skolnik.com</a>	773.362.1900

We appreciate your understanding of this corrective action, and express our thanks to Larry Bierlein and the US Department of Transportation.

Yours most sincerely,

*HZ Skolnik*

Howard Z. Skolnik, President  
SKOLNIK INDUSTRIES, INC.

**Approval for Steel Drums with Amended Stack Tests  
(49 CFR 178.606)**

KEY: TIGHTHEADS    OPEN HEAD LEVER LOCK    OPEN HEAD BOLT RING

DRUM SIZE & STYLE	TYPE	EXPIRATION DATE	GAGE	UN SOLIDS RATING	UN LIQUIDS RATING	SII REPORT #
0502Q CQ	OH	12/11/07	1.2 / 0.9 / 0.9	1A2 / X60 / S	1A2 / Y1.5 / 150	133
0502Q HM	OH	12/11/07	1.2 / 0.9 / 0.9	1A2 / X60 / S	1A2 / Y1.5 / 150	133
0802Q CQ	OH	12/11/07	1.2 / 0.9 / 0.9	1A2 / X100 / S	1A2 / Y1.5 / 150	134
0802Q HM	OH	12/11/07	1.2 / 0.9 / 0.9	1A2 / X100 / S	1A2 / Y1.5 / 150	134
0803 CQ	TH	01/15/08	0.9	LIQUIDS ONLY	1A1 / X1.4 / 250	166
1002Q CQ	OH	10/10/07	1.2 / 0.9 / 0.9	1A2 / X120 / S	1A2 / Y1.5 / 150	134
1002Q HM	OH	10/10/07	1.2 / 0.9 / 0.9	1A2 / X120 / S	1A2 / Y1.5 / 150	134
1602Q CQ	OH	04/25/07	1.2 / 0.9 / 0.9	1A2 / Y200 / S	1A2 / Y1.5 / 200	138
1602Q HM	OH	04/25/07	1.2 / 0.9 / 0.9	1A2 / Y200 / S	1A2 / Y1.5 / 200	138
1603 CQ	TH	12/28/07	0.9	LIQUIDS ONLY	1A1 / X1.4 / 250	047
2001 CQ	OH	12/28/07	1.5 / 1.5 / 1.5	1A2 / X195 / S	1A2 / Y1.5 / 200	031
3007Q CQ	OH	10/12/07	1.5 / 1.2 / 1.2	1A2 / X235 / S		156
3014 CQ	OH	01/07/08	1.5	1A2 / X235 / S	1A2 / Y1.5 / 200	007
3018Q CQ	OH	10/12/07	1.5 / 1.2 / 1.2	1A2 / X235 / S		156
5502 HM	OH	11/27/07	1.5 / 1.2 / 1.2	1A2 / X440 / S	1A2 / Y1.5 / 150	040
5502Q HM	OH	11/30/07	1.5 / 1.2 / 1.2	1A2 / X400 / S	1A2 / Y1.5 / 150	141
5504 CQ	OH	11/13/07	1.2 / 0.9 / 0.9	1A2 / X425 / S	1A2 / Y1.2 / 100	014
5504 HM	OH	11/13/07	1.2 / 0.9 / 0.9	1A2 / X425 / S	1A2 / Y1.2 / 100	014
5506 CQ	OH	11/01/07	1.2	1A2 / X435 / S	1A2 / Y1.5 / 150	119
5506Q CQ	OH	11/30/07	1.2	1A2 / X435 / S	1A2 / Y1.4 / 150	117
5507 CQ	OH	11/27/07	1.5 / 1.2 / 1.2	1A2 / X440 / S	1A2 / Y1.5 / 150	040
5507Q CQ	OH	11/30/07	1.5 / 1.2 / 1.2	1A2 / X400 / S	1A2 / Y1.5 / 150	141
5508 CQ	OH	09/19/07	1.5	1A2 / X430 / S	1A2 / Y1.5 / 175	011
5508Q CQ	OH	12/05/07	1.5	1A2 / X430 / S	1A2 / Y1.4 / 175	164
5515 CQ	TH	12/14/07	1.2	LIQUIDS ONLY	1A1 / X1.8 / 300	016
5516 CQ	TH	12/11/07	1.2	LIQUIDS ONLY	1A1 / X1.8 / 300	021
8501 HM	OH	09/26/07	1.5	1A2 / X440 / S	1A2T / Y320 / S	001
8501 PH	OH	09/26/07	1.5	1A2 / X440 / S	1A2T / Y320 / S	001
8501Q HM	OH	10/18/07	1.5	1A2 / X440 / S	1A2T / Y320 / S	114
8501Q PH	OH	10/18/07	1.5	1A2 / X440 / S	1A2T / Y320 / S	114
8519 HM	OH	03/30/07	1.0	1A2 / X440 / S	SOLIDS ONLY	113
8519Q HM	OH	04/27/07	1.0	1A2 / X425 / S	SOLIDS ONLY	163
8520 HM	OH	09/26/07	0.9	1A2 / Y440 / S	SOLIDS ONLY	036
8520Q HM	OH	10/18/07	0.9	1A2 / Y440 / S	SOLIDS ONLY	115
9620 CQ	OH	11/15/07	0.9	1A2 / Y440 / S	SOLIDS ONLY	161
9620 HM	OH	11/15/07	0.9	1A2 / Y440 / S	SOLIDS ONLY	161



**Pipeline and Hazardous  
Materials Safety Administration**

**APPROVAL CA2007010019**  
**(FOURTH REVISION)**

**ISSUED BY THE COMPETENT AUTHORITY OF THE UNITED STATES**

**EXPIRATION DATE: January 30, 2012**

1. **APPROVAL HOLDER:** **Skolnik Industries, Inc.**  
4900 South Kilbourn Ave.  
Chicago, IL 60632-4593
2. **REGULATORY AUTHORITY:** 49 CFR § 178.601(h) Approval of equivalent packagings.
3. **SYNOPSIS:** Skolnik Industries, Inc. is authorized to manufacture, mark and sell certain UN 1A1 and UN 1A2 steel drum design types that have periodically recertified utilizing one sample for the stacking test and have been tested to or are known to be capable of meeting the applicable standards for a DOT Specification 7A, Type A packaging. As noted in Skolnik Industries, Inc. application, the metal thicknesses and fabrication are the same and the designs types were 7A-tested as open heads. Tightheds of the same metal thicknesses (UN 1A1) are known to perform the same as open heads in the stack test. In addition, all UN 1A1 and UN1A2 steel drums were stack tested successfully during previous design qualification testing.
4. **BASIS:** This approval is issued in response to Skolnik Industries, Inc.'s application dated January 19, 2007.
5. **PERIOD OF VALIDITY AND CONDITIONS OF APPROVAL:** This approval does not provide relief from any requirements of the Hazardous Materials Regulations except as stated herein. This approval is valid until the posted expiration date, until terminated by the Associate Administrator for Hazardous Materials Safety or upon renewal.
  - a. **Approved Materials:** Those hazardous materials authorized to be transported in UN 1A1 and UN 1A2 steel

drum design types as referenced from Section 172.101, may be transported in packagings authorized under the terms of this approval.

b. Packaging: The packagings consists of steel UN 1A1 and UN 1A2 drums of up to 110-gallon rated capacity as described in the Skolnik Industries, Inc. application dated January 19, 2007, on file with the Office of Hazardous Materials Special Permits and Approvals. These design types meet all of the criteria for UN1A1 or UN1A2 drums, except that during the periodic recertification testing stack testing was conducted on one sample.

6. **MODES OF TRANSPORTATION AUTHORIZED:** Motor vehicle and rail freight.

7. **SPECIAL PROVISIONS:**

a. A current copy of this approval must be maintained and made available for examination at each location where materials are packaged and offered for transportation.

b. Any person who offers for transportation or transports the above-described package(s) may do so under the authority of this approval if all requirements and conditions of this approval are met.

c. Any person who receives a package covered by this approval may reoffer it for transportation provided no modifications or changes are made to the package and it is reoffered for transportation in conformance with this approval.

d. After February 8<sup>th</sup> 2007, no new manufacture of these drums is authorized without proper design qualification testing, markings requirements or proper periodic retesting.

8. **GENERAL PROVISIONS:**

a. Failure by any person to comply with the terms and conditions of this approval and the Hazardous Materials Regulations, 49 CFR Parts 171-180, may result in the modification, suspension or termination of that person's authority to use this approval. Failure to comply may also subject that person to penalties prescribed by 49 U.S.C. §§ 5123 and 5124. This approval may be modified, suspended

or terminated in its entirety if that action is justified in light of changes in circumstances or additional information not available when this approval was issued. Unless immediate modification, suspension or termination is necessary to avoid a risk of significant harm to persons or property, before action is taken, that person will be notified and provided with an opportunity to show why the proposed action should not be taken.


b. Each "Hazmat employee," as defined in § 171.8, who performs a function subject to this approval must be provided training on the requirements and conditions of this approval in addition to the training required by §§ 172.700 through 172.704.

c. Any person operating under the terms of this approval must comply with the security plan requirement in Subpart I of Part 172 of the HMR, when applicable.

Issued in Washington, D.C.

Dated: February 12, 2007

Approved by:

*for* 

Bob Richard  
Deputy Associate Administrator for  
Hazardous Materials Safety

Address all inquiries to: Associate Administrator for Hazardous Materials Safety, Pipeline and Hazardous Materials Safety Administration, Department of Transportation, Washington, D.C. 20590. Attention: PHH-32.