



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

SEP - 8 1999

Mr. Eugene J. Secor
HB Fuller Company
25200 Malvina Avenue
Warren, MI 48089

Ref. No. 99-0198

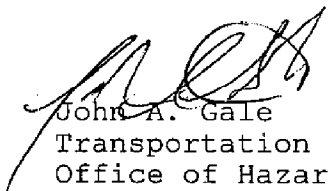
Dear Mr. Secor:

This is in response to your letter dated July 13, 1999, and subsequent telephone conversation with a member of my staff, regarding the small quantity exception in § 173.4 of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically you ask if your one piece molded plastic device consisting of two separate reservoirs would be considered two separate inner receptacles.

Upon examination of your device it is the opinion of this Office that it is two separate receptacles that are attached. Provided each receptacle contains less than the quantities specified in § 173.4 for inner receptacles, you may qualify for the small quantity exception.

I hope this satisfies your request.

Sincerely,



John A. Gale
Transportation Regulations Specialist
Office of Hazardous Materials Standards



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H.B. Fuller Automotive
Products, Inc.

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July 13, 1999

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**US DEPARTMENT OF TRANSPORTATION
RSPA
STANDARDS DEVELOPMENT, DHM-11
400 SEVENTH ST., SW
WASHINGTON, DC 20590-0001**

Re: Dual Discharge Syringe containing two different Hazardous Materials

Gentlemen:

Our company makes a reactive adhesive system consisting of two parts, both of which are hazardous materials for transportation purposes. Part A is classified as Amines, Liquid, Corrosive, nos, (Aliphatic Amine), 8, UN 2735, III and Part B is classified as Isocyanate solution, Toxic, nos, (Hexamethylene diisocyanate), 6.1, UN 2206, II.

Although Parts A & B can be sold and shipped in separate containers for use with large metering equipment; for prototype purposes it is preferred in dual syringes. This type syringe consists of two (2) tubes connected via a shut-off valve at the bottom (An example is enclosed). One tube would contain Part A whereas the other tube would contain Part B. Discharge is 50% by volume of part A & B; Mixing occurs at discharge through the nozzle. Each filled syringe is inserted into a foil bag which is then sealed.

This particular packaging combination does not appear to meet the definition of a chemical kit nor does it meet the definition of Polyester Kit. Since this package contains both of the aforementioned hazmats together; albeit separated in different tubes, how would one classify this package combination for shipment? Would this combination meet the small quantity exception in 173.4 presuming that it was packaged in nested, strong outer packagings, etc or would the Limited Quantity Exception be a more progressive choice?

The Department's assistance is much appreciated on this particular query. An expeditious reply would be most helpful. I can be reached at 810-498-1317 during the day.

BEST REGARDS,

**EUGENE J SECOR
HB FULLER COMPANY
25200 MALVINA AVE
WARREN, MI 48089**

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