



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

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

MAY -3 2006

Mr. Timothy Wagner
President
Transport Management Group
15400 Pearl Road # 236
Strongsville, OH 44136

Ref. No. 06-0016

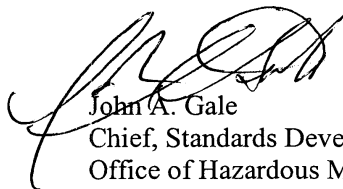
Dear Mr. Wagner:

This responds to your January 17, 2006 letter requesting clarification concerning the use of a UN 1A2 steel drum containing a plastic inner receptacle under the International Civil Aviation Organization's Technical Instructions for the Safe Transport of Dangerous Goods by Air (ICAO Technical Instructions). Specifically, you request clarification regarding the use of an open-head drum certified for liquids as an outer packaging for a combination packaging containing a plastic inner bottle without retesting as a combination packaging.

A UN 1A2 steel drum that is an authorized single packaging may contain inner receptacles that are compatible with the lading as long as the inner receptacles would not adversely impact the level of performance of the packaging. This configuration would comply with the HMR and the ICAO Technical Instructions. The packaging would remain marked as a single packaging.

I hope this information is helpful. Please contact us if you require additional assistance.

Sincerely,



John A. Gale
Chief, Standards Development
Office of Hazardous Materials Standards



060016

173.24a(6)(3)



Leary
§ 173.24a (b)(3)
Packagings
06-0016

January 17, 2006

International Standards Coordination Office
DHM-5 US Department of Transportation
400 7th Street Southwest
Washington DC 20590

Dear Mr. Mazzulle:

We encounter a problem regarding our UN packaging for a plastic can, which has a metal friction lid. According to our research, there will never be an armlock/ringlock developed for this can to enable the cartoned product to pass the pressure test required for air freight.

Therefore, we have been putting the plastic can into a five gallon UN1A2, as the "outer" of a combination packaging, with absorbent material, when it is shipped via air. This UN1A2 is not marked as a "combination" containing the "S" in the UN Specification Marking. This method of packaging is authorized under 49 CFR 173.24a (b) 3, which states "A single or composite non-bulk packaging which is tested and marked for liquid hazardous materials may be filled with a solid hazardous material to a gross mass, in kilograms, not exceeding the rated capacity of the packaging in liters, multiplied by the specific gravity marked on the packaging, or 1.2 if not marked." The sealed can inside is considered a "solid."

Due to the existing provision in 49 CFR, our packaging is compliant for domestic shipments. The problem occurs when it is an ICAO/IATA export shipment.

We are applying for a formal approval/addition of the same provision in 49 CFR, to the ICAO Technical instructions, citing justification as allowable in 49CFR. An approval in ICAO would also further the harmonization effort.

Let me know if you have any questions, or need additional information. I look forward to your forth coming reply.

Regards,

Timothy Wagner
President
Transportation Management Group, Inc.
15400 Pearl Road #236
Strongsville, Ohio 44136
866.572.8644