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Transportation/Hazardous Materials: Pipeline and Hazardous Materials Safety Administration Interpretive Letter Addressing Testing of Non-Bulk Packages

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The United States Pipeline and Hazardous Materials Safety Administration ("PHMSA") responded in a September 17th interpretive letter to a question seeking clarification of the Hazardous Materials Regulations ("HMR") applicable to the testing of non-bulk packages.

The PHMSA letter is in response to a May 7th email from Daniels Training Services, Inc. ("DTS").

DTS asked that PHMSA clarify the non-bulk packaging filling limits found in § 173.24a(b).

Section 173.24a(b)(3) states in relevant part:

"A non-bulk packaging not exceeding 400 kg 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, or gross mass of the package, multiplied by the specific gravity or gross mass of the package marked on the packaging, or 1.2 if not marked."

DTS asks for clarification of the phrase "gross mass of the package." The company asks whether the formula in § 173.24a(b)(3) allows:

. . . for a shipper to multiply the actual gross mass of the package by the gross mass marked on the package to achieve a total value that may exceed the actual gross mass of the package.

PHMSA replies in the negative. It states that the intention of § 173.24a(b)(3) is for a shipper to multiply the rated capacity of the package by the marked specific gravity and fill to a maximum of that calculated mass, in kilograms, or the 400 kg maximum, whichever is less.

A copy of the September 17th letter can be downloaded [here](#).