Transportation/Hazardous Materials: U.S. Pipeline and Hazardous Materials Safety Administration Interpretive Letter Addressing Packaging Question



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The United States Pipeline and Hazardous Materials Safety Administration ("PHMSA") addressed in a November 9th interpretive letter the application of the federal Hazardous Materials Regulations ("HMR") to inner receptacles within an authorized single packaging. See Reference No. 26-0085.

PHMSA was responding to a question from Daniels Training Services, Inc. ("DTS") asking whether:

… packing multiple 500 g Teflon® bags of solid powder hazardous material into an authorized United Nations (UN) standard packaging for motor vehicle transport is permitted, and whether this configuration constitutes a single or combination packaging.

PHMSA states that the configuration described is permitted without additional testing. It is stated to be consistent with past interpretations referenced in DTS's request where an authorized single packaging for hazardous material may contain inner receptacles—such as sealed plastic or Teflon® bags—that are compatible with the lading, as long as the inner receptacles do not adversely affect the level of performance of the packaging.

Therefore, PHMSA states that the packaging must still marked as a single packaging.

A copy of the interpretive letter can be found here.