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Transportation\Hazardous Materials: U.S. Pipeline and Hazardous Materials Safety Administration Addresses Lab Packs Question

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The United States Pipeline and Hazardous Materials Safety Administration ("PHMSA") addressed in a March 21st letter or request for clarification of the Hazardous Materials Regulations applicable to certain segregation requirements.

The PHMSA letter was in response to a July 5, 2016 question from Pioneer Tank Lines, Inc. ("Pioneer") seeking clarification regarding the segregation requirements for lab packs containing hazardous waste materials under 173.12(e) and 177.848.

Pioneer first asked for confirmation that the requirements for lab packs in 173.12(e) are contradictory as they relate to the segregation requirements in 177.848(d) for those materials designated with an "O" in the Segregation Table.

PHMSA stated that such an understanding was incorrect. The agency noted:

According to 173.12(e), a hazardous waste material that is not blocked and braced during transportation would be subject to the segregation requirements in 177.848(d). Overpack of this material is not specifically required. If you choose to package this material in such a manner, you will have to comply with the overpack requirements in 173.25, in addition to the package handling requirements of 173.12(e). Further, the conditions and limitations of 173.12(e) do not provide an allowance for consolidation on a single pallet. The requirements expressly state that the materials must be separated from incompatible materials by a minimum of four (4)(b).

Pioneer also asked if lab packs containing sufficient quantities of chemically-compatible absorbent material, in accordance with 173.12(b)(2)(i), that are used to prevent comingling of liquid content will satisfy the segregation requirements in 177.848(e)(3).

PHMSA responded to this question in the negative. The Agency states:

This manner of packaging is not sufficient because preventing the comingling of materials cannot be assured if the package were to fail and the conditions normally incident to transportation.

[A copy of the PHMSA letter can be downloaded here.](#)