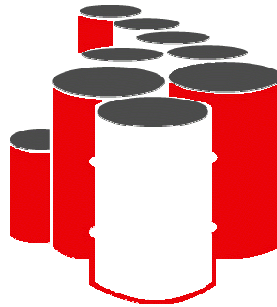


Steel Shipping Container Institute



P.O. Box 100907
Arlington, VA 22210-3907

Tel 571.527.0779
Fax 571.527.0781
Email: ssci_info@steelcontainers.com

Advisory on Closure/Assembly Issues

Pre-torqued, Cap-Sealed Drums. Some customers are requesting, as a purchase order requirement, that drum manufacturer members of the Steel Shipping Container Institute (SSCI) deliver new steel drums with the fitting in the $\frac{3}{4}$ -inch closure on the packaging pre-torqued in conformance with the manufacturer's closure/assembly instructions. Cap-sealing this opening after closure also may be requested. It has come to light that in some instances where the customer purchasing the packaging has requested that the smaller opening be pre-closed and cap-sealed, those involved in fill operations may only be closing the 2-inch top opening on the drum in conformance with provided closure/assembly instructions. Reportedly, Pipeline & Hazardous Materials Safety Administration (PHMSA) field staff (enforcement personnel) observing operations have cited fillers for NOT complying with the drum manufacturer's closure/assembly instructions by assuring that BOTH the 2"-inch and $\frac{3}{4}$ "-inch fittings are closed as directed.

Section 173.22 – Shipper's Responsibility, in Title 49 of the Code of Federal Regulations (CFR) states, in part, at Section (a) (4):

For a DOT Specification or UN standard packaging subject to the Requirements of part 178 of this subchapter, a person must perform *all functions necessary* (Emphasis added) to bring the package into compliance with parts 173 and 178 of this subchapter, as identified by the packaging manufacturer or subsequent distributor (for example, applying closures consistent with the manufacturer's closure instructions) in accordance with Section 178.2 of this subchapter.

Purchasers and fillers of steel drums are required to comply with the provisions of the CFR cited above whether or not they request the manufacturer to close, pre-torque, and cap-seal the $\frac{3}{4}$ -inch opening, or any other opening, on a new steel drum prior to filling. PHMSA has noted that the fitting in the pre-closed opening could back off in transit and, therefore, the filler is obligated to insure that both the 2-inch and $\frac{3}{4}$ -inch closures are secure in conformance with the packaging manufacturer's instructions prior to transportation.

091411