

## CLOSING INSTRUCTIONS – PLASTIC DRUMS

United States Department of Transportation regulations state that packaging manufacturers are required to notify each person to whom the packaging is transferred of all requirements not met at the time of transfer. This requirement is given in Title 49, Code of Federal Regulations (49 CFR), Part 178 Specifications for Packagings, §178.2(c). In addition this Paragraph requires the closing information to be provided to any person to whom this package is transferred who may need to close the packaging prior to re-shipment. Furthermore, it is the shipper's responsibility as set forth in §173.22(a)(4) to ensure that these closing instructions are carried out as described. In order to ensure the instructions are followed in a manner to result in safe transport of hazardous materials the shipper is obligated, as set forth in §172.704(a)(4), namely-function specific training-to train his/her employees in the correct way to close the packaging for shipment. In order to fulfill this obligation the shipper often turns to the packaging manufacturer for this training since the manufacturer has designed, produced and tested the packaging to meet UN performance standards. The manufacturer is prepared to provide this training in addition to supplying closing instructions. It has been the practice of the manufacturer to send closing instructions attached to the shipping documents with each shipment of drums. This document provides specific information on closing the manufacturer's packagings.

**These closing instructions must be given to the individuals responsible for closing the packagings prior to shipment. Many companies use electronic copies as site specific work instructions and/or use laminated hard copies posted at the fill lines for reference by the fill line operators. A hard copy (printed) must be maintained by the filler of offeror for shipment.**

The following tables and text give examples of the parts and closing torque required to prepare the drum for shipment so that it is capable of meeting the performance standards indicated by the UN marking on the side or top of the packaging.

The manufacturer recommends that only parts that have been tested and certified by the manufacturer be used to close the packagings for shipment. Any UN marking is voided if parts or components other than those as sold with the original packaging design are used. Each closure is supplied with the proper gasket in accordance with the UN design type tests for the packaging supplied. In the case of removable head drums the lids, gaskets and locking rings are supplied as tested.

### PRIOR TO CLOSING:

Inspect each closure to ensure that the closure has the proper gasket and that both closure and gasket are in good condition. Inspect the sealing surface for damage and make sure the threads and sealing surfaces are dry. Replace any defective gaskets, plugs or lids with new, defect free parts identical to those in the design qualification.

### CLOSING PROCEDURES FOR PLUGS AND CAPS:

1. The plug or cap is inserted into the appropriate opening and screwed down "hand tight" until the gasket is in contact with the sealing surface.
2. A torque wrench capable of applying the proper torque to the fitting as specified by the closing instructions following is then used to tighten the plug or cap until it reaches the pre-set torque as indicated by a release or click. These wrenches should be calibrated at least annually. Adjustable wrenches available at hardware stores, auto parts stores, and through equipment catalog suppliers and drum parts suppliers.

### PLASTIC NON-REMOVABLE HEAD DRUMS

All non-removable head, UN 1H1, and 1H1W Plastic Drums, 49 CFR § 178.509(a)(1), 15 gallon to 65 gallon nominal capacity supplied with plug or screw cap closures with gaskets must be closed for shipment using only the closures and gaskets supplied and specified in the design qualification test for the drum as indicated below.

	Part Size / Part Number (Plug number with gasket)	Torque
A	<b>2-inch buttress:</b> L10 EPDM; L10B Buna; L10VT FPM <sup>ii</sup>	20-25 ft.-lbs.
B	<b>2-inch NPS:</b> L16 EPDM <sup>ii</sup> ; L16B Buna; L16VT FPM; L16RVCLG	20-25 ft.-lbs.
G	<b>¾-inch NPS:</b> C34 or C39 (S) AD with C31 EPDM; C31 Silicone	6-9 ft.-lbs.