

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. MAUSER is prepared to provide this training in addition to supplying closing instructions.

**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 or offeror for shipment.**

**MAUSER recommends that only parts that have been tested and certified by MAUSER be used to close the packagings for shipment. Any UN marking is voided if parts or components other than those as sold with or specified by the original packaging design are used. In the case of removable head drums the lids, gaskets and locking rings are supplied as tested.**

#### **PRIOR TO CLOSING:**

Inspect each lid to ensure that the lid has the proper gasket (if applicable) and that both lid and gasket (if applicable) are in good condition. Inspect the sealing surface on the drum for damage and make sure the sealing surface is dry. Replace any defective lids or gaskets (if applicable) with new, defect free parts identical to those listed in the design qualification and periodic recertification tests.

#### **FIBER REMOVABLE HEAD DRUMS**

1. All removable head, UN 1G, Fiber Drums, 49 CFR § 178.508(a), of nominal capacity 8 to 65 U.S. gallons supplied with plastic lids, or fiber lids, or metal lids, gaskets (if applicable) and associated locking rings, must be closed for shipment using only the components specified in the design qualification and periodic recertification tests according to the following installation instructions:
  - For fiber drums with poly bags:
    - Insert poly bag into drum. Standard bag is a 3 mil (0.076 mm) polyethylene bag. A "B2" or "B3" will be in the product code for drums sold with this bag installed. Specialty heavy duty and/or antistatic bags and the use of multiple bags will be noted in like manner in the product code and certification documentation. Customer supplied bags must be at least identical to the bag or bags specified in the certificates in terms of material of construction, size, thickness and strength.
    - Fill contents and close bag or bags with wire tie or plastic cable (zip) tie as specified. Customer supplied ties must be at least identical to those in the certification documents in terms of size, material of construction, size and strength.
  - For all fiber drums, place drum lid with gasket (if applicable) and selected locking ring as supplied on the top opening of the drum body.
    - Place locking ring tab up for top latch style rings & tab down for bottom latch style rings.
  - Firmly place lid onto top opening by applying downward pressure to lid above drum sidewall.
  - While pressing down on lid, engage locking mechanism of locking ring to secure the lid in place. Make sure the locking mechanism is completely latched. Insert locking tab into slots in locking ring handle.