



U.S. Department  
of Transportation

**Research and  
Special Programs  
Administration**

400 Seventh Street, S.W.  
Washington, D.C. 20590

FEB 27 1998

Ms. Lisa Smith  
Safety Director  
Big T Transfer Inc.  
P.O. Box 287  
New Albany, IN 47151-0287

Dear Ms. Smith:

This is in response to your letter of February 26, 1998, requesting clarification of the packaging requirements for calcium carbide under the Hazardous Materials Regulations (HMR; 49 CFR parts 171-180). Specifically you ask whether calcium carbide may be transported domestically in a DOT 56 portable tank.

The answer is yes. The Hazardous Materials Table (§ 172.101) references § 173.241 under Column 8B for bulk packaging requirements and B101 under Column 7 for special provisions. Section 173.241(c) authorizes use of a DOT 56 portable tank. Special provision B101 states "Authorized only in metal intermediate bulk containers." This means that when intermediate bulk containers are used they must be metal. It does not preclude use of a DOT 56 portable tank.

For your information we will propose a change to special provision B101 for clarification purposes in the near future. I hope this information is helpful.

Sincerely,

Delmer F. Billings  
Chief, Standards Development  
Office of Hazardous Materials Standards

# BIG TRANSFER INC.

P.O. Box 287  
New Albany, IN 47151-0287  
MC - 146108

*LaValle*  
*File: 172.102.801*

February 26, 1998

To: DOT-Research Special Programs Administration  
Attn: Diane LaValle  
Fax#: (202)366-8700

Dear Ms. LaValle,

As instructed I am writing to request clarification of Special Provision 101 - "Authorized only in metal intermediate bulk containers".

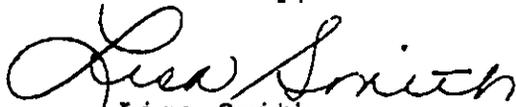
Does this mean the product can ONLY be loaded in metal intermediate bulk containers or does it mean that IF the product is loaded in intermediate bulk containers, they must be metal?

Please send the determination to my attention at fax number (812) 280-1226.

If you need additional information I can be reached at (800)994-2448 between the hours of 8:00AM and 5:00PM Monday through Friday.

Thank you for your help and time.

Sincerely,



Lisa Smith  
Safety Director