U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

DEC - 4 2000

Mr. David Friedman
US Environmental Protection Agency
Office of Research and Development
Washington DC 20460

Ref. No. 00-0308

Dear Mr. Friedman:

This is in response to your letter dated August 22, 2000 regarding the shipment of environmental samples. Specifically, you ask if a inside receptacle of a combination packaging that does not meet the outage requirements of 49 CFR 173.24a(d) may be placed inside a secondary packaging capable of containing all of the liquid in the primary receptacle.

Section 173.24a(d) states that liquids may not completely fill a receptacle at a temperature of 55 °C (131 °F) or less. It is the opinion of this office that hazardous material may be placed in an inside container of a combination packaging that does not itself meet the outage requirements of § 173.24a(d) provided that the inner packaging is placed within a secondary inside packaging which does meet the outage requirements and other applicable packaging requirements of the Hazardous Materials Regulations (49 CFR Parts 171-180).

I hope this satisfies your request.

Sincerely,

Thomas G. Allan

Thomas G. Allan
Senior Transportation Regulations Specialist
Office of Hazardous Materials Standards