Alert 16-02: A Reminder About National Motor Freight Classification Standards for Steel Drums

Background
Although steel drums are among the most robust packaging manufactured in the United States, occasionally damage occurs during shipment. This can be prevalent among steel drums that are not manufactured in accordance with appropriate regulatory codes or performance standards. Often when a steel drum is imported from overseas, the container may not perform well in the diverse distribution environments encountered in the United States if the drum is not manufactured in accordance with U.S. standards.

Although users of steel drums are generally familiar with regulations regarding the transportation of hazardous materials codified in Title 49 of the Code of Federal Regulations (CFR), another body sets requirements for packaging used to transport both hazardous and nonhazardous products by motor carrier: the National Motor Freight Traffic Association (NMFTA), a nonprofit organization comprised of motor carriers operating in interstate, intrastate and foreign commerce.

NMFTA publishes the National Motor Freight Classification® (NMFC®) standard, which provides specifications, rules and requirements for the proper packaging of goods moving by motor carrier; these rules are internationally recognized. NMFC® standards are considered to be the minimum requirements necessary to ensure that goods are adequately protected and can be handled and loaded in a manner that is reasonably safe in order to withstand the normal rigors of the less-than-truckload environment. Compliance with this standard is essential to provide adequate protection for your products in the motor carrier environment for the transport. The standard also contains various procedures for the filing and disposition of freight claims. Additionally, if damage occurs to the packaging during shipment, compliance with the NMFC® standard must be demonstrated in order to provide coverage for damage claims.

NMFC® 100-AP Item 260: Standards for Steel Drums
The section of the NMFC® standard that addresses the use of steel drums is NMFC® Item 260. When the product being shipped is not regulated by the U.S. Department of Transportation (DOT) under Title 49 CFR §178, choosing a drum that complies with NMFC® Item 260 is essential to ensure safe transportation of the product in the motor carrier environment.

The provisions set forth under NMFC® Item 260 lay out requirements for the construction and integrity of the package: construction standards and design details that specify the requirements including size and weight limits, minimum thickness, marking and the use of liners. The general requirements are as follows:

- The manufacturer’s name or an identifying symbol or trademark of manufacturer in lieu of the manufacturer’s name and which symbol or trademark must be registered with the Commodity Classification Standards Board and, if used for the shipment of hazardous materials, the U.S. DOT.
- Marking requirements for one-way drums have been changed from single trip container (STC) to “Non Reusable for Liquids.”
NMFC® Item 260 also has very specific requirements regarding construction, seaming and thickness. For more details on these requirements, visit http://www.nmfta.org/pages/nmfcpackaging.

**Enforcement**
Questions often arise concerning what entity enforces conformance to NMFC® Item 260. In fact, during roadside inspections by state officials, compliance checks with the drum standard may occur especially if packaging damage is readily apparent or an investigation occurs. It is highly recommended that purchasers of steel drums require conformance with NMFC® Item 260 in their specifications in order to avoid costly and false freight claims.

**Links for More Information**
- For more, visit http://www.nmfta.org/pages/nmfcpackaging

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