Gemini Industries, Inc.	ndustries, Inc. DOT Container Closing Instructions		
Standard Operating Procedure		EHS-22-0003 01	
Author	Status	Effective Date	
Michael Boblit	Final	10/6/2022	

1.0 Purpose

According to the DOT [49 CFR 178.2 (c) (1) (ii)], closing instructions are required to be provided to whomever a packaging is transferred. The closing instructions contain "information specifying the type(s) and dimensions of the closures, including gaskets and any other components needed to ensure that the packaging is capable of successfully passing the applicable performance tests. This information must include any procedures to be followed, including closure instructions for inner packaging and receptacles, to effectively assemble and close the packaging for the purpose of preventing leakage in transportation."

2.0 Scope

Just as important, fillers and shippers of hazardous materials packaging must follow the closing instructions they receive. This includes making sure you apply the correct torque to all drum closures, crimp lids properly, insert plugs per spec, etc. 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. This procedure will contain closing instructions from each commonly used container supplier. These instructions will be posted in the Fill-off environments as well for quick reference.

3.0 Safety

*Absolutely NO Electronic Devices in the Hazardous Environments.

(Production, Fill-Off, TWP Room)

*Absolutely NO use of headphones, ear buds, etc. inside the Warehouse and/or Hazardous Environments.

4.0 DOT Container Closing Instructions

FOLLOW WORK PROCEDURES IN ORDER TO DO YOUR JOB ACCURATELY.

Standard Operating Procedure

EHS-22-0003 01

4.1 **One Gallon and Quart Cans**



Insert plug into ring (top of container) to a depth of .025" above the top of the container's double seam. This distance is measured from the double seam to the top of the plug curl. The insertion depth should be consistent around the circumference of the container.

4.2 **5-Gallon Pails**

- 4.2.1 Determine that the pail/cover combination is the correct specification for the material being filled.
- 4.2.2 Place the cover on pail. Ensure that it is evenly seated around the curl of the pail.

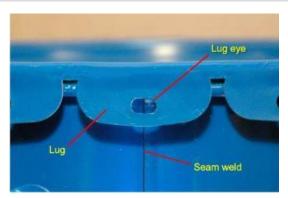


The eye of one of the lugs should be centered directly over the seam weld of the pail

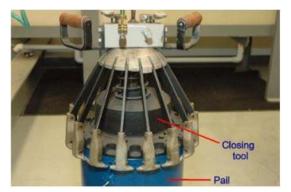
DOT Container Closing Instructions

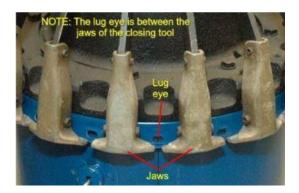
Standard Operating Procedure

EHS-22-0003 01



4.2.3 Lower the closing tool onto the cover. Rotate the tool in order to position the lug eyes between the jaws of the closing tool.



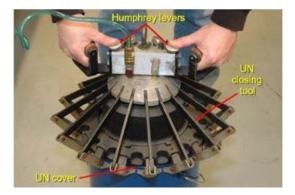


4.2.4 To close the pail with the *pneumatic closing tool*, push the Humphrey levers on the top of the closing tool

DOT Container Closing Instructions

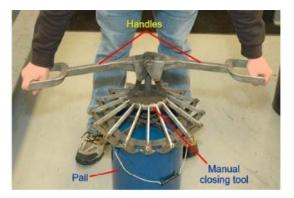
Standard Operating Procedure

EHS-22-0003 01



When the downward motion of the tool stops, release the levers

4.2.5 To close the pail with the *manual closing tool*, push the handles down and out until the downward motion stops



When the downward motion of the tool stops, release the handles.



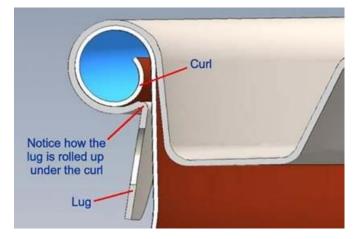
Note: The use of pneumatic and manual closing tools is detailed in this closing instruction; however, many packaging facilities use automated closing tools; regardless of the closing tool used, the quality of the closure is critical.

4.2.6 Check the integrity of the close to be sure that the cover is properly crimped. Ideally, the cover lugs should be rolled up under the curl as shown in the drawing below.

DOT Container Closing Instructions

Standard Operating Procedure

EHS-22-0003 01



4.2.7 Remove the closing tool. The lugs should be crimped under the curl of the pail at least 90° from the starting position

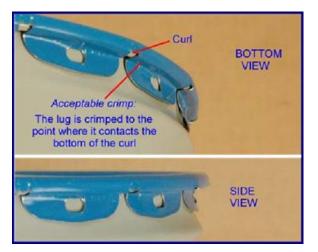
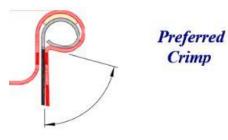


Figure 1: Preferred Crimp

Review the following photographs and drawings that illustrate the *preferred* crimp, the *acceptable* crimp and the *unacceptable* crimp.



DOT Container Closing Instructions

Standard Operating Procedure

EHS-22-0003 01

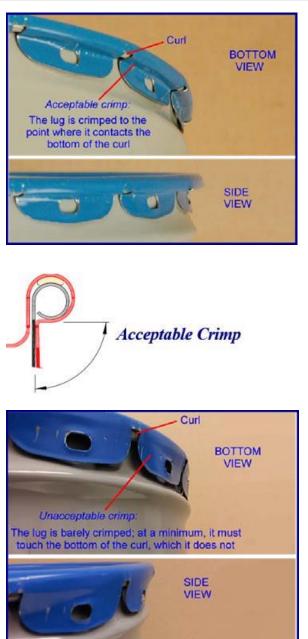


Figure 2: Unacceptable Crimp



DOT Container Closing Instructions

Standard Operating Procedure

EHS-22-0003 01

4.3 **Reconditioned Steel Drums**

			hMin	ded
		AN EAR	DRUMCO THMINDED COMP M4918	ANY
		RESPONSIBLE	CONTAINER MA	NAGEMENT
		UN 1A1 and UN	1A2 CONTAINE	R CLOSURES
1.	Inspect co	over gasket to ensure	it is fully retained	in cover.
2.	Place cov toward th	er on container maki e ground.	ng sure ring lugs a	re pointed down
3.		fficient downward pr ng is fully engaged u		
4,	Insert 5/8" bolt through ring lug (and jam nut if used). During the performance testing of this package, jam nuts were not used. Use of a jam nut is therefor optional but not required. As yout tighten bolt, sharply tap down and in with a bras or equivalent hammer starting 180 degrees from the bolt and then at several differen areas around ring, working back toward the lugs, until there is no further loosening of the bolt.			
5.		rated torque wrench gainst ring lug witho		60 ft/lbs. When jam nut is used lock
		When filling 1A1 dru ng a 1A2 drum throu		art below. Also, use this same chart
		ng a 1A2 drum throu		
	when fili ZE/TYPE sket	ng a 1A2 drum throu	gh the 2" opening.	
Ga 2"	when fili ZE/TYPE sket	ng a 1A2 drum throu Recomment TRISURE STEEL Rubber/Poly 20 ft/lbs 12 ft/lbs	gh the 2" opening. ded Plug or Bung t <u>RIEKE STEEL</u> Rubber/Poly 30 ft/lbs 15 ft/lbs	orque in ft/lbs TITE SEAL STEEL Bung/Gasket 40 ft/lbs 30 ft/lbs
Ga 2" 3/4 <u>NY</u>	when fili <u>ZE/TYPE</u> sket w /LON FIR	ng a 1A2 drum throu, Recomment TRISURE STEEL Rubber/Poly 20 ft/lbs 12 ft/lbs 1H1 and 1H2 E RATED HEX OR	gh the 2" opening. led Plug or Bung t <u>RIEKE STEEL</u> Rubber/Poly 30 ft/lbs 15 ft/lbs 2 Fittings Rubber of <u>ROUND HEAD</u>	orque in ft/lbs TITE SEAL STEEL Bung/Gasket 40 ft/lbs 30 ft/lbs
Ga 2" 3/4 <u>NN</u> 2" UN ab	when fili ZE/TYPE sket (LON FIR) – 18 to 22 V Certified	ng a 1A2 drum throu Recomment TRISURE STEEL Rubber/Poly 20 ft/bs 12 ft/bs 11 and 1H2 E RATED HEX OR ft/bs - 3/4" - 7 container closures	gh the 2" opening. ded Plug or Bung t <u>RIEKE STEEL</u> Rubber/Poly 30 ft/lbs 15 ft/lbs 2 Fittings Rubber of <u>ROUND HEAD</u> 10 11 ft/lbs nust be installed	orque in ft/lbs TITE SEAL STEEL Bung/Gasket 40 ft/lbs 30 ft/lbs

Standard Operating Procedure

EHS-22-0003 01

4.4 Steel Drums

The conversion ft/lb – Kgm-Nm has been rounded off; the following conversion factors were used.

1 Kgm =10 Nm

1 ft/lb = 0.13825 Kgm

After tightening of plugs, torques will reduce over a period. Particularly plastic components are subject to stress relaxation resulting in reduction of torque. In general, no re-tightening of plugs will be required when the recommended torques have been applied.

For Quality Assurance purposes, it is recommended to calibrate pneumatic torque wrenches.

Rubber includes Buna, EPDM, Viton, etc. and P.E. stands for standard Polyethylene and P.I. stands for Poly Irradiated.

RECOMMENDED CLOSING TORQUES

Plug Type	Washer	¾" Closure			2" Closure		
	Түре	Ft/lbs	Kgm	Nm	Ft/lbs	Kgm	Nm
Steel Plugs	Rubber	12 (+/- 1)	1.5 - 1.8	14.7 - 17.7	20 (+/- 1)	2.6 - 2.9	25.5 - 28.4
	P.E.	12 (+/- 1)	1.5 - 1.8	14.7 - 17.7	20 (+/- 1)	2.6-2.9	25.5 - 28.4
Plastic	Rubber	10 (+/- 1)	1.2 - 1.5	11.8-14.7	22 (+/- 1)	2.9-3.2	28.4 - 31.4
Plugs	P.E.	10 (+/- 1)	1.2 - 1.5	11.8 - 14.7	16 (+/- 1)	2.1 - 2.4	20.6 - 23.5

Over torquing is just as bad as under torquing. Use recommended value range:

4.5 **Open Head Drums**

Drum Closure Specifications

	Steel & Plastic Drum Turque Setti	ings
3/8" Wrench	¾" Bung	12 ftlbs.
3/8" Wrench	2" Bung	25 ftlbs.
1/2" Wrench	Open Lid Steel Drum Exterior Bolt	70 ftlbs.

FULL OPEN TOP STEEL DRUM WITH BOLTED RING CLOSURE

- 1. Place cover on drums.
- Snap the closing ring over the cover and top lip of the drum. Make sure the ring's lugs point down below the ring. Also make sure that the bottom edge of the closing ring engages under the top lip of the drum.
- Insert the bolt through the lug without threads. Next, screw on the locking nut. Finally, screw the bolt onto the threaded lug.
- While tightening the bolt, tap the entire perimeter of the ring with a mallet, starting directly across from the bolt.
- Tighten the bolt until 70 foot pounds of pressure is reached. The cover and ring should not spin, but the free ends of the rim should have a ¼" space maximum.
- Drums closed in this manner have met the UN performance test requirements as specified in the container marking

DOT Container Closing Instructions

Standard Operating Procedure

EHS-22-0003 01

- 4.5.1 All removable head, UN 1A2, steel drums, 49 CFR 178.504(a)(2), that are supplied with bolt rings, bolts, gaskets and lids must be closed for shipment using only the components supplied in the design tests for the drum.
- 4.5.2 Place lid with gasket in place, as supplied, on the curl at the top of the drum body.
- 4.5.3 Place cover ring around the drumhead and curl. Verify cover and drum curl are pinched together and within the recess of ring profile. You are required to pound ring with non-sparking mallet or use head press to compress gasket.

For bolt ring

- 1. insert bolt into ring right lug.
- 2. Thread jam nut into bolt, if needed, and then into threaded lug, and tighten bolt to specification.
- 3. Hammer around circumference of ring while torque is applied to further seat head onto drum.
- 4. Continue hammering on ring circumference and torque the bolt until the torque does not loosen when further hammering on the ring circumference is performed.
- 5. Tighten jam nut against unthreaded lug. Ring ends must **not** touch when proper torque is applied.
- 6. Drive bolt into the lug until the ends of the bolt ring are as follow: A gap of 3/16" 1/8" is achieved.
- 4.5.4 If prescribed ring gap cannot be achieved, torque ring to 75 +/- 5 ft/lbs. Then ends of the ring should **not** be touching.

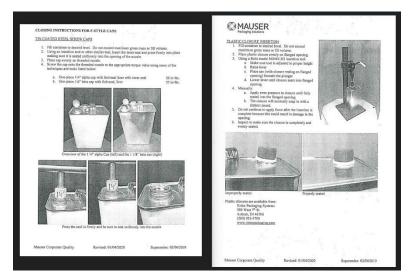
4.6 **F-Style One Gallon Cans**

4.6.1 Closing Instructions

DOT Container Closing Instructions

Standard Operating Procedure

EHS-22-0003 01



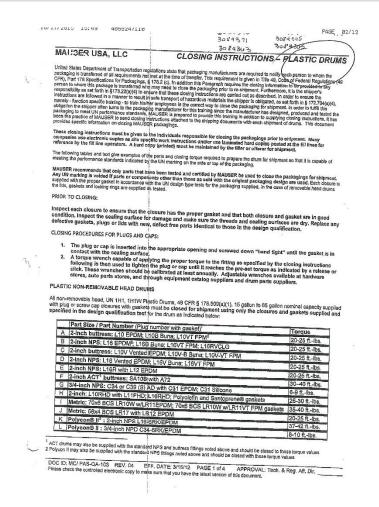
4.7 Plastic Drums

4.7.1 Closing Instructions

DOT Container Closing Instructions

Standard Operating Procedure

EHS-22-0003 01



5.0 References

Reference	Title
1	None