



**DEFENSE LOGISTICS AGENCY  
DEFENSE ENERGY SUPPORT CENTER**

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IN REPLY  
REFER TO

DESC-BQ

Aug 01, 2003

MEMORANDUM FOR: DESC Quality Assurance Workforce

SUBJECT: Quality Assurance Advisory (QAA) 2003-05, Quality Assurance Guidance

The purpose of this Advisory is to clarify the requirements that exist in the CFR concerning the transportation of samples by Quality Assurance Specialists.

1. Hazardous Materials Regulations do not apply to Government personnel transporting samples while performing in a non-commercial capacity.

Inquiry to Department of Transportation was made concerning the transportation of JP8 and JetA-1 via GOV's, POV's and Rental Vehicles. Direct quote "The Hazardous Materials Regulations (HMR) govern the transportation of hazardous materials in commerce. Shipments of hazardous materials transported by a government entity in vehicles operated by government personnel for noncommercial purposes are not "in commerce" and subsequently not subject to the HMR. Government agencies that move hazardous materials in rented vehicles are also not subject to the HMR. Though renting a vehicle is a commercial agreement, the movement is not subject to the HMR as long as a government employee operates the vehicle for non-commercial purposes." (HMR: 49 CFR Parts 171-180)

Samples moved by government employees engaged in official duties are not required to meet commercial requirements.

2. Samples must be transported in a safe manner.

The containers should be in good condition; samples should be properly sealed and not leaking. Glass bottles require additional protection to prevent breakage in transport. Sample containers should be secured as to prevent excessive movement and hard contacts.

3. Packaging of samples

It is recommended that samples be placed in plastic bags prior to placement into transport vehicle or into additional packing material. This is to ensure that vehicle and or additional packing material is not subject to contamination during transport. Methods to isolate glass sample bottles include use of bubble wrap, paper, plastic snowflake material, fabric or similar substance. Isolated bottles should be secured in some fashion to include use of boxes or use of tie down straps to restrain samples from excessive movement

during transport. Metal containers should be secured and not allowed free movement in transport via blocking or using tie-down straps or similar method to ensure safe transfer of samples to laboratory.

Should there be any questions or comments regarding this advisory please contact one of the following:

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