



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

MAY 14 1998

Mr. Terry Zost
Manager, Logistics Services
Autoliv ASP, Inc.
3350 Airport Road
Odgen, Utah 84405

Dear Mr. Zost:

This is in response to your letter dated January 21, 1998, regarding the definition of an overpack. Specifically, you ask if two or more packages are considered overpacked if they are secured to a wooded pallet by metal or composite banding.

The Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) define an overpack in § 171.8 as an enclosure that is used by a single consignor to provide protection or convenience in handling of a package or to consolidate two or more packages. Section 171.8 provides the following examples of overpacks: (1) one or more packages placed or stacked onto a board such as a pallet and secured by strapping, shrink wrapping, stretch wrapping or other suitable means; or (2) one or more packages placed in a protective outer packaging such as a box or a crate. It is the opinion of this Office that the packaging scenario provided in your letter constitutes an overpack in accordance with both the HMR and the International Civil Aviation Organization's Technical Instructions for the Transport of Dangerous Goods by Air.

I hope this satisfies your request.

Sincerely,

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

21 January 1998
9520-FY-006

Hale
File: 173.25
SC: 346, 388

Autoliv

U.S Department of Transportation
Research and Special Programs Administration
Office of Hazardous Materials Standards
400 Seventh Street, SW
Washington, DC

Attention: Mr. Edward Mazzullo, Director

Subject: Request for Interpretation, Overpack

References: (A) Title 49 CFR Section 171.8
(B) Memo BAX Global
(C) IATA/ICAO

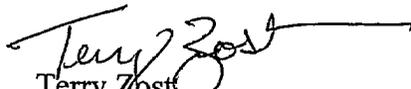
Dear Mr. Mazzullo:

As you know, reference (A) defines an Overpack, in part as "(1) Placed or stacked onto a load board such as a pallet and secured by strapping, shrink wrapping, stretch wrapping or other suitable means;" This definition, according to reference (B), is in direct conflict with reference (C) which defines an overpack as "An enclosure used by a single shipper to contain one or more packages and to form one handling unit for convenience of handling and storage."

Autoliv ASP has requirements to ship two or more packages, via Air, on a wooden pallets secured by metal or composite banding. In our view these shipments would qualify as overpacks. Autoliv ASP respectfully requests DOT interpretation as to whether or not this method qualifies as an overpack.

If there is any additional information we can provide please feel free to call Mr. Glen Wanczyk at 801 625 9543 or Fax 801 625 7012.

Very truly yours,


Terry Zost
Manager, Logistics Services

Attachment: Memo from Bax Global

Copy to: IATA Mr. Shawn Gerber
TRW Mr. Mike King
BAX Global Mr. Bill Hampton

Autoliv ASP, Inc.
3350 Airport Road
Ogden, Utah 84405

Phone: (801) 625-4800
Fax: (801) 625-4911

**** ADMIN **** ARGUS+ MESSAGE (SNDM)
MSG#: M13JAN12918.AUTOLIV-AND-OVERPACK
ORIG: BDGA
DEST: SLCE

ATTN: STEVE KINGHORN
FROM: RUSS BOWEN
SUBJ: AUTOLIV AND OVERPACKS

BY: BDGRAB1 AT: 14:26 13JAN98

BAX POLICY ON OVERPACKS

UNDERSTANDING THAT AN OVERPACK IS NOT MEANT TO ADD ANY ADDITIONAL INTEGRITY TO THE PACKAGE, THE OVERPACK MATERIAL MAY BE MADE OF ANYTHING AS LONG AS THE MATERIAL MEETS THE FIRST TWO WORDS OF THE DEFINITION, I.E., "AN ENCLOSURE", AS REFERENCED IN THE IATA DGR IN THE GLOSSARY. BANDING CANNOT MEET THE FIRST TWO WORDS OF THE DEFINITION, "AN ENCLOSURE". THE USA GOVERNMENT HAS STATED IN A LETTER OF INTERPRETATION THAT SHRINK WRAP MEETS THE DEFINITION OF AN OVERPACK AS LONG AS ALL OF THE PACKAGES ARE SURROUNDED BY THE SHRINK WRAP, BUT WAS INTERESTINGLY MUTE ON THE SUBJECT OF BANDING. WE ALL KNOW THAT THE THIN BANDS CANNOT POSSIBLY "ENCLOSE" PACKAGES. THEREFORE BAX WILL ACCEPT ANY MATERIAL FOR AN OVERPACK AS LONG AS IT "ENCLOSES" THE PACKAGES.

IF THERE IS NOT CLEAR VISIBILITY TO THE PACKAGES CONTAINED IN AN OVERPACK, THEN THE LABELS AND MARKINGS ON THE PACKAGES WITHIN THE OVERPACK MUST BE REPRODUCED ON THE OUTSIDE OF THE OVERPACK. IF THE OVERPACK CONTAINS "UN" SPECIFICATION PACKAGES, AND IF THE SPECIFICATION MARK IS NOT VISIBLE, THEN THE STATEMENT "INNER PACKAGES COMPLY WITH PRESCRIBED SPECIFICATIONS" MUST APPEAR ON THE OVERPACK USED TO ENCLOSE THESE PACKAGES.

REGARDS,

RUSS
