



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

JUN 28 2000

Mr. John Byers
Corrugated Container Corporation
PO Box 20369
Roanoke, VA 24018

Ref. No. 00-0138

Dear Mr. Byers:

This is in response to your letter dated May 5, 2000, and subsequent telephone conversation with Eric Nelson of my staff requesting clarification of marking requirements for UN standard packagings under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if the date when periodic retesting is required for a combination packaging is two years from the date of manufacture or the date of the original design qualification test.

The answer is the date of the original design qualification test. A combination or composite packaging may be marked as being "manufactured" on the date on which the packaging was assembled. "Assembly" is the physical act of placing inner packagings or a liner into an outer packaging. It is important to note here that the date of a design qualification test or periodic retest and the date of manufacture are two different things. The date marked on the packaging does not necessarily reflect the date the packaging was tested.

For example, a combination packaging that is tested in January 1998 may be manufactured anytime within 24 months after that test, and dated the year it is manufactured, which would be 1998, 1999, or 2000; or the packaging may be dated the year it is assembled, which could be any year thereafter. Aside from the date the packaging is assembled, the packaging design must be retested by the end of January, 2000.

I hope this satisfies your request.

Sincerely,

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



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178.601

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Nelson
00-0138



Corrugated Container Corporation

Date: Friday, May 05, 2000 visit us at www.cccbox.com

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Pages: 1

Subject: Recertification date confirmation

I spoke with Mindy in your office about 2 months ago, and Joan MacIntire this morning. I need a clarification of Mind's information in writing on the following situation. My customer had a combination 4G pack certified by a test lab in March of 98. The application tested was a small user, and a production order was not entered until November of 98 (8 months later). According to Mindy the date to use for recertification is the date of manufacture, not the test date. Please clarify and fax back to me asap. Thanks in advance for your assistance.

*PO Box 20369
Roanoke VA 24018*