



U.S. Department  
of Transportation  
**Research and  
Special Programs  
Administration**

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

JUL 16 2001

Ms. Linda McCarthy  
Defense Logistics Agency  
2001 Mission Drive  
New Cumberland, PA 17070-5000

Ref. No. 00-0320

Dear Ms. McCarthy:

This is in response to your letter and subsequent telephone conversation with a member of my staff requesting clarification of Variation 2 in 49 CFR 178.601(g). Specifically, you ask whether retesting is required for a combination packaging with one inner fiberboard box weighing 5 pounds if the packaging was tested with four 1 quart inner glass bottles weighing 2.5 pounds each. You also ask whether there is a limit on the size of the inner fiberboard box.

Under § 178.601(g)(2), for combination packagings, Variation 2 allows inner packagings of any type in an outer packaging without retesting if the specific conditions of the variation are met. There is no restriction on the size of the inner fiberboard box, however, it may not exceed half of the gross mass (the weight of the inner packagings plus the weight of the contents) of the inner packagings used for the drop test. For air transport, packagings must also comply with § 173.27(c)(1) and (c)(2). If all of the provisions in § 178.601(g)(2)(i) through (vii) are met, the combination packaging with one inner fiberboard box is not required to be retested.

I hope this information is helpful. Please contact us if you need further assistance.

Sincerely,

Hattie L. Mitchell, Chief  
Regulatory Review and Reinvention  
Office of Hazardous Materials Standards

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Office of Hazardous Materials Standards

DHM-12:McIntyre:06/25/01  
§ 178.601



**DEFENSE LOGISTICS AGENCY**  
DEFENSE DISTRIBUTION CENTER  
2001 MISSION DRIVE  
NEW CUMBERLAND, PA 17070-5000

*McIntyre*  
*2 178.60(g)(2)*  
*Packaging*  
*00-0320*

IN REPLY  
REFER TO

DDC-J3/J4-O

MEMORANDUM FOR DOT, RSPA, OFFICE OF HAZARDOUS MATERIALS  
STANDARDS

SUBJECT: Request For Interpretation of CFR49, 178.601 (g)(2)

This office as the Defense Logistics Agency focal point for Performance Oriented Packaging (POP) testing receives questions concerning interpretations of the CFR 49 regulation. We have a question on the use of Selective Testing, 49 CFR, Paragraph 178.601 (g)(2) "Variation 2". Can a lesser number of larger packagings be shipped in a tested container meeting the requirements for testing of Variation 2 without further testing? For example, a packaging is tested with 4-1 quart inner glass bottles weighing 2.5 pounds each, total weight of inner packagings is 10 pounds, each 1-quart bottle is eight inches in height and two inches in diameter. Provided the cushioning requirements can be satisfied, can one fiberboard box weighing 5 pounds, ten inches in height and four inches in diameter be substituted for the 1-quart original inner container? Is there an upper limit on the size of the fiberboard box?

Thank you for your assistance in this matter. Action officer for this matter is Linda McCarthy, DSN: 977-8238, Commercial 717-770-8238, FAX extension is 7143.

*Linda Mc Carthy*

Linda McCarthy  
Packaging Specialist  
Program Manager, POP

Post-It® Fax Note	7671	Date	11/16/00	# of Pages	1
TO	E HAZZULLO	FROM	L. CARNEY		
CO. / DEPT.	DIRECTOR	CD	DDC		
Phone #		Phone #	717-770-8238		
Fax #	202-366-3012	Fax #	717-770-7143		