



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

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

AUG 2 2002

Mr. Tony Senzel
Quality Manager
Corrugated Supplies Corporation
5101 West 65th Street
Chicago, IL 60630

Ref. No. 02-0167

Dear Mr. Senzel:

This responds to your June 5, 2002 letter requesting clarification on basis weight tolerance for UN certified boxes under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask what is the basis weight tolerance allowed under the HMR.

In your letter, you give an example of a third party UN approved laboratory certifying a package with a paper combination of 42/23/42 (lbs/MSF). After an audit and additional testing, it is determined that the package has an actual basis weight combination of 40.8/25.1/42.0. You ask if this deviation in the basis weight is a basis for rejection and a violation under the HMR.

It is the opinion of this Office that the packaging with the different basis weight is a "different packaging" because it is not identical to the packaging tested. Accordingly, the different design must be tested as required in 49 CFR Part 178, Subpart M.

I hope this answers your inquiry.

Sincerely,

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



020167

178.

June 5, 2002

RE: BASIS WEIGHT TOLERANCE ON HAZMAT PACKAGING

Mr. Edward T. Mazzullo
U.S. DOT/RSPA (DHM-10)
400 7th Street S.W.
Washington, D.C. 20590-0001

Boothe
Part 3178,
Packaging
02-0167

Dear Mr. Mazzullo,

I am requesting information regarding UN certified boxes. Specifically, what is the basis weight tolerance allowed by the D.O.T.? I do not see this addressed anywhere in the CFR-49 regulations that deal with packaging.

For example, suppose a 3rd party UN approved laboratory certifies a package with a paper combination of 42/23/42 (lbs/MSF). Then somewhere down the line, this package is randomly audited by the D.O.T.. The D.O.T. determines, through their own lab testing, that the package has an actual basis weight combination of 40.8 / 25.1 / 42.0. The first two substrates are off the certification target by 2.9% and 9.1%, respectively, while the third is right on target. Would this example be rejected, flagged, etc. by the D.O.T.?

Paper mills typically run most grades to a basis weight target and have tolerances or upper and lower limits of +/- 5%.

We have several, large customers who are heavily involved in HazMat shipments. They are concerned that 3rd party labs have identified packaging manufactured by our company that does not exactly match their certification.

I look forward to hearing from you.

Sincerely,

Tony Senzel
Quality Manager
Corrugated Supplies Corporation