



U.S. Department  
of Transportation

**Pipeline and  
Hazardous Materials Safety  
Administration**

JAN 24 2006

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

Mr. Larry Snellings  
Vice-President, Dangerous Goods  
P.O. Box 60543 AMF  
Houston, TX 77205-0543

Reference No.: 05-0285

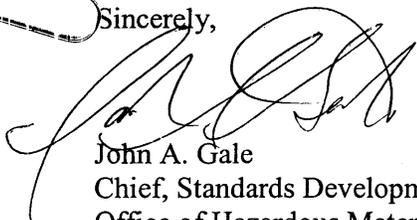
Dear Mr. Snellings:

This is in response to your October 27, 2005 letter regarding the applicability of the Hazardous Materials Regulations (HMR; 49 CFR Parts 100-180) to non-bulk performance-oriented packaging standards. Specifically, you ask for a definition of "other suitable means" used in the construction of natural wood and plywood boxes, respectively.

The standards for boxes containing natural wood or plywood are found in §§ 178.513 and 178.514, respectively. The HMR do not specifically define "other suitable means." However, provided the strength of the material used is appropriate to the capacity and intended use of the box, the tops and bottoms of natural wood boxes may be made of materials similar to water-resistant reconstituted wood. Similarly, provided the strength of the materials used is appropriate to the capacity and intended use of the packaging, other materials may be used together with plywood in the construction of plywood boxes.

I trust this satisfies your inquiry.

Sincerely,



John A. Gale  
Chief, Standards Development  
Office of Hazardous Materials Standards



050285

178.513  
178.514

# Dangerousgoods.com Inc.

## Houston Texas USA

OCTOBER 27, 2005

ATTN EDWARD MAZZULL  
DIRECTOR – OFFICE HM REGULATIONS  
400 - 7<sup>TH</sup> STREET S.W. ( DHM-10)  
WASHINGTON D.C. 20590

Foster  
§ 178.513  
§ 178.514  
Packagings  
05-0285

REQUEST FOR LETTER OF INTERPERTATION:

SIR,

AFTER SPEAKING WITH YOUR FIELD AGENT, YOUR 800 HOTLINE AND YOUR OFFICE VIA PHONE I AM NOW FOLLOWING THE NEXT STEP IN THE PROCESS OF OBTAINING CLARIFICATION ON THE REGULATIONS,

SPECIFICALLY CFR 49 178.513 FOR WOOD BOX / 178.514 FOR PLYWOOD BOX

IN BOTH REFERENCES IT STATES THAT THE USE OF “OTHER SUITABLE MATERIAL” IS ALLOWED.

IF POSSIBLE I NEED CLARIFICATION OF WHAT “OTHER SUITABLE MATERIAL” IS OR AT WHAT POINT OR PERCENTAGE OF MATERIAL USED IN CONSTRUCTION DOES A BOX MADE OF WOOD SIDES AND ENDS WITH A PLYWOOD TOP AND BOTTOM NO LONGER MEET THE REQUIREMENTS OF A “WOOD” BOX AND BECOME A PLYWOOD BOX.

IN THE USE OF “OTHER SUITABLE MATERIAL” IS PLYWOOD CONSIDERED “OTHER SUITABLE MATERIAL” AND IF SO WHAT PERCENTAGE OF CONSTRUCTION CHANGES A BOX FROM BEING A WOOD BOX TO A PLYWOOD BOX.

A COPY OF THIS REQUEST HAS ALSO BEEN SENT TO IATA AND THE UN REPRESENTATIVE FOR CLARIFICATION.

YOUR ASSISTANCE IN THIS MATTER IS GREATLY APPRECIATED.

RESPECTFULLY

LARRY SNELLINGS  
VP DANGEROUSGOODS.COM  
HOUSTON TEXAS USA

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