



U.S. Department
of Transportation

Pipeline and Hazardous Materials
Safety Administration

1200 New Jersey Ave., SE
Washington, DC 20590

NOV 19 2008

Mr. Scott A. Ferguson
Emerson Process Management
835 Innovation drive
Knoxville, TN 37932

Ref. No.: 08-0238

Dear Mr. Ferguson:

This responds to your October 1, 2008 request for clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask for clarification of the term "manufacturing joints" as used in §178.516(b)(3) of the HMR.

Section 178.516 specifies standards for a 4G fiberboard box. Paragraph (b)(3) requires manufacturing joints in the bodies of boxes, if part of the design, to be taped, lapped and glued, or lapped and stitched with metal staples. According to your letter, you manufacture a 4G box that includes a die cut top flap with side tuck flaps. You state that the 4G box has passed the performance tests in Subpart M of Part 178. You ask whether the flaps must be taped, lapped and glued, or lapped and stitched with metal staples in accordance with §178.516(b)(3).

The answer is no. Based on our review of the pictures and information provided in your letter, the box you manufacture satisfies the requirements in §178.516 for a 4G fiberboard box.

I hope this answers your inquiry.

Sincerely,

Susan Gorsky
Acting Chief, Standards Development
Office of Hazardous Materials Standards

Boothe (b)
§ 178.516(3)
Definitions
08-0238

Drakeford, Carolyn <PHMSA>

From: INFOCNTR <PHMSA>
Sent: Wednesday, October 01, 2008 1:15 PM
To: Drakeford, Carolyn <PHMSA>
Subject: FW: CLARIFICATION ON UN 4G PACKAGING (THIS IS COMPLETE INQUIRY - PLEASE DISREGARD FIRST SEND)
Attachments: RSC_Glue Tab (1).jpg; RSC_Glue Tab (2).jpg; Die Cut (2).jpg; Die Cut (1).jpg

From: Scott.Ferguson@Emerson.com [mailto:Scott.Ferguson@Emerson.com]
Sent: Wednesday, October 01, 2008 10:20 AM
To: INFOCNTR <PHMSA>
Subject: CLARIFICATION ON UN 4G PACKAGING (THIS IS COMPLETE INQUIRY - PLEASE DISREGARD FIRST SEND)

To Whom It May Concern:

I am writing for clarification on some terminology and intent surrounding the standards for fiberboard boxes as described in 49 CFR 178.516 (3) "Manufacturing joints" and the applicable subparts. My question concerns the definition of "manufacturer's joints" - I interpret this as follows: the means (whether taped, glued, or stitched) in which a corrugated box body (panels) are closed into a square, rectangular, or some other hex shape. In the case of a regular slotted carton (RSC), the manufacturer includes a glue or stitch tab (typically 1" - 2" depending on the corrugated board) which is equal to the depth of the box which is used to "close" the box body. (Shown in attached pictures RSC_Glue Tab (1).jpg and RSC_Glue Tab (2).jpg.)

We are looking to use another style of box (die cut top flap with side tuck flaps, as defined by the testing agency) that I am wishing to clarify if it meets the intention of the 49 CFR as defined above. I would argue that our particular style of die cut box does not have a manufacturing joint (as I interpret above), so the pictures (Die Cut (1).jpg and Die Cut (2).jpg) attached would not be a compliant UN 4G shipping fiberboard box as it is manufactured. Additionally, this box has passed UN 4G testing; however, from my best understanding, the testing does not include manufacturing-style compliance.

After doing some reasonable web-surfing for 4G images, I cannot find one image that is similar to the die cut box as pictured above. Most boxes are RSCs with taped manufacturer's joints or die cuts that are fabricated with a glue/stitch tab as a manufacturer's joint much as a RSC. Please clarify that the die cut in the picture I have provided is indeed compliant as defined by 49 CFR 178.516.

Regards,

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