



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, D.C. 20590

OCT 2 2008

Mr. Randy Hill  
Chemtran Services USA, Inc  
P.O. Box 62456  
Houston, TX 77205-2456

Ref. No.: 09-0176

Dear Mr. Hill:

This responds to your July 23, 2009 letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) concerning the testing of specification packagings. According to your letter, you successfully completed testing a UN 4GV combination package using a 1 gallon fragile glass jug as an inner packaging and vermiculite cushioning and absorbent material. You ask if you can replace the vermiculite absorbent material with polystyrene absorbent sheet pads and replace the vermiculite used to suspend the inner packaging inside the fiberboard outer packaging with a fiberboard sleeve without retesting the completed package.

The answer is no. The substitution of a different absorbent material and a different means of suspending the inner packaging inside of the outer packaging constitutes a new packaging design. Each new packaging design is subject to design qualification testing under Part 178, Subpart M.

I trust this satisfies your inquiry. If we can be of further assistance, please contact us.

Sincerely,

Charles E. Betts  
Chief, Standards Development  
Office of Hazardous Materials Standards



Leary  
§178.601  
Testing  
09-0176

July 23, 2009

Mr. Edward T. Mazzullo  
Director, Office of Hazardous Materials Standards  
U.S. DOT/PHMSA (PHH-10)  
1200 New Jersey Avenue, SE East Building, 2nd Floor  
Washington, DC 20590

Dear Sirs,

My question concerns combination packaging certification regarding 49CFR 178.601.Variation 1.

I have completed successful 4GV testing of a fiberboard combination package using a 1 gallon fragile glass jug inner container. To secure the inner container in position inside the package, this tested design used vermiculite absorbent material to provide for inner package suspension and absorbency inside the package.

I would like to use this 4GV outer package and suspend the same glass inner container inside the outer package by using a 350 lb double-wall fiberboard sleeve (made from the same material as the outer container) to secure the inner container in position while maintaining equivalent spacing between to inner package and the inside wall of the outer container, referencing (178.601 (g) (2) (iii).

In addition, I would like to replace vermiculite absorbent medium with multiple polystyrene absorbent sheet pads (12) as the absorbent medium. Absorbency tests have proven that the pads exceed the vermiculite's liquid absorbency.

This inner sleeve and absorbent pad design clearly maintains an equivalent or higher level of performance of the packaging (49 CFR 178.601 (g) (1) (i) A-F), and sufficient additional cushioning material is used to take up void spaces and to prevent significant moving of the inner packagings.

Can I use this new configuration without re testing the 4GV package?

Sincerely,

Randy Hill  
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