

From: [INFOCNTR \(PHMSA\)](#)
To: [Dodd, Alice \(PHMSA\)](#)
Cc: [Baker, Yul \(PHMSA\)](#); [Hazmat Interps](#)
Subject: FW: Clarification request - 49 CFR 173.226 (3) (iii)
Date: Monday, May 5, 2025 14:23:55

Hi Alice,

Please see the below interpretation request. Let us know if you need anything.

Sincerely,
Janaye

From: Tatiana Smoleeva <Tatiana.Smoleeva@mauserpackaging.com>
Sent: Monday, May 5, 2025 12:49 PM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Cc: Tatiana Smoleeva <Tatiana.Smoleeva@mauserpackaging.com>
Subject: Clarification request - 49 CFR 173.226 (3) (iii)

You don't often get email from tatiana.smoleeva@mauserpackaging.com. [Learn why this is important](#)

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Dear PHMSA,

I am seeking clarification on 173.226 (3) (iii) with regards to cap seal applied to non-bulk packaging.

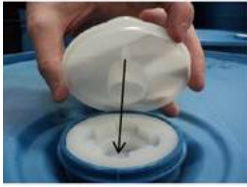
The section 173.226 (3) reads as the following...

(3) Have screw-type closures that are—

- (i) Closed and tightened to a torque prescribed by the closure manufacturer, using a properly calibrated device that is capable of measuring torque;*
- (ii) Physically held in place by any means capable of preventing back-off or loosening of the closure by impact or vibration during transportation; and*
- (iii) Provided with a cap seal that is properly applied in accordance with the cap seal manufacturer's recommendations and is capable of withstanding an internal pressure of at least 100 kPa (15 psig).*

Background: Cap seals are used on packaging as a means of tamper evidence. They are applied over screw type closure, either by 'push on' or 'crimp on' method. Please see photos below.

Push on cap seal



Crimp on cap seal



Question: It is our understanding that cap seal should be tested to a minimum of 100 kPa on packaging with its screw type closures (plugs) installed and tightened according to manufacturer's closing instructions. Is our understanding correct?

Thank you for your prompt response.

With kind regards,

Tatiana Smoleeva

Director, Regulatory & Testing

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The Department of Transportation regulations require that the filler or offeror for shipment determine hazard class, packing group and suitability of the packaging for transportation including compatibility with the materials of construction and any gaskets, coatings, linings and surface treatments and service equipment. Further it is the shipper's responsibility to close each container according to the manufacturers' closing instructions.

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