



Casey, C.  
26-0046

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## Fwd: Request for Interpretation: Closure Instructions and Banding Substitution for UN Packaging

1 message

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**INFOCNTR (PHMSA)** <infocntr.infocntr@dot.gov>

Wed, Apr 8, 2026 at 4:34 PM

To: Hazmat Interps <hazmatinterps@dot.gov>, "Baker, Yul (PHMSA)" <yul.baker@dot.gov>

Good afternoon,

Please see the below interpretation request. Her mailing address and phone number are:

7400 Tod Ave SW  
Warren, Ohio 44481

330-651-8774

Let us know if you need anything,

Janaye

----- Forwarded message -----

From: **Richelle Swogger(Richelle Swogger)[richellepugh]** <richellepugh@ultiumcell.com>

Date: Tue, Apr 7, 2026 at 3:57 PM

Subject: Request for Interpretation: Closure Instructions and Banding Substitution for UN Packaging

To: [infocntr@dot.gov](mailto:infocntr@dot.gov) <[infocntr@dot.gov](mailto:infocntr@dot.gov)>

Dear Sir or Madam,

I am requesting clarification regarding the application of 49 CFR §178.2(c) as it relates to manufacturer's closure instructions for UN specification packaging.

We are currently using UN certified packaging that includes manufacturer-provided closure instructions specifying the following banding requirements:

Material: PET (polyester)

Width: 16.0 mm

Thickness: 1.0 mm

Fastening strength: 1000 N

At this time, the specified 16.0 mm PET banding has been discontinued by the supplier, and we are experiencing difficulty sourcing an exact replacement that meets these precise dimensions.

We are evaluating whether an alternative banding configuration (e.g., 5/8 inch PET banding) may be used in place of the specified 16.0 mm banding, provided it meets or exceeds the required material properties, thickness, and fastening strength.

We note that in 49 CFR Part 393 (cargo securement), dimensions are sometimes expressed with approximate inch equivalents, including references where 16 mm is identified as approximately 5/8 inch. We are seeking clarification on whether such dimensional equivalencies are intended to be applied more broadly, or if they are limited to the specific regulatory context in which they are provided.

We would appreciate PHMSA's clarification on the following:

1. Under 49 CFR §178.2(c), are shippers required to strictly adhere to the manufacturer's closure instructions as provided, including exact banding dimensions and material specifications?
2. In cases where a specified component in the closure instructions is no longer commercially available, does PHMSA allow the use of an alternative that can be demonstrated to provide an equivalent or greater level of performance than the tested configuration?
3. If such substitutions are permissible, what type of documentation or validation would be considered sufficient to demonstrate equivalency (e.g., manufacturer certification, engineering analysis, or performance testing)?
4. Would the use of 5/8 inch PET banding (15.9 mm) be considered acceptable in place of 16.0 mm banding if all other specified requirements, including thickness and fastening strength, are met or exceeded?

Our intent is to remain fully compliant with the Hazardous Materials Regulations while addressing practical sourcing limitations and ensuring that the performance of the packaging is not compromised.

Thank you for your time and consideration. Please let me know if any additional information is needed.

Sincerely,



Richelle Swogger

Ultium Cells LLC | GPSC Business Planner

[richellepugh@ultiumcell.com](mailto:richellepugh@ultiumcell.com)

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