



Larson, R.
26-0049

Fwd: Clarification request

1 message

Nicks, Michael <michael.nicks@dot.gov>

Fri, Apr 17, 2026 at 10:16 AM

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

Cc: "Pollack, Arthur (PHMSA)" <arthur.pollack@dot.gov>, "INFOCNTR (PHMSA)" <infocntr@dot.gov>

Good morning Yul,

Please have this interpretation request logged into the interpretation database. Although the requestor is a third-party packaging test lab, the request pertains to testing and not just an requirement of their approval, so it is best that this be handled as an interpretation divorced from their approval.

Thank you,

Michael Nicks
Transportation Specialist
Office of Hazardous Materials Safety
Pipeline and Hazardous Materials Safety Administration
U.S. Department of Transportation
(304) 989-6507
michael.nicks@dot.gov



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From: **Approvals (PHMSA)** <approvals@dot.gov>

Date: Thu, Apr 16, 2026 at 1:11 PM

Subject: Fwd: Clarification request

To: Nicks, Michael (PHMSA) <michael.nicks@dot.gov>

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From: **Rafael Cameron** <rcameron@advanced-labs.com>

Date: Thu, Apr 16, 2026 at 1:01 PM

Subject: Clarification request

To: approvals@dot.gov <approvals@dot.gov>

Cc: Rafael Cameron <rcameron@advanced-labs.com>, Monica White <mwhite@advanced-labs.com>, Tony White <twhite@advanced-labs.com>, Charles Hernandez <chernandez@advanced-labs.com>

Good afternoon. My name is Rafael Cameron from Advanced Packaging Technology Laboratories. I hope all is well with you. Advanced Packaging Technology Laboratories (APTL) is requesting clarification on the following issue. Per the 49 CFR, it is stated that test samples that contain plastic inners (other than plastic bags) need to be conditioned to -18°C (0°F) or lower. When referencing the large packaging section, this exception is not stated. Please see the referenced sections and APTL's comments below.

Per 49CFR178.965 large packaging with inner receptacles must be conditioned to -18°C (0°F) or lower.

§ 178.965 Drop test.

(c) Conditioning. Rigid plastic Large Packagings and Large Packagings with plastic inner receptacles must be conditioned for testing by reducing the temperature of the packaging and its contents to -18°C (0°F) or lower. Test liquids must be kept in the liquid state, if necessary, by the addition of anti-freeze. Water/anti-freeze solutions with a minimum specific gravity of 0.95 for testing at -18°C (0°F) or lower are considered acceptable test liquids, and may be considered equivalent to water for test purposes. Large Packagings conditioned in this way are not required to be conditioned in accordance with [§ 178.960\(d\)](#).

This is not a requirement for non-bulk bags containing solids or articles.

§ 178.603 Drop test.

(c) Special preparation of test samples for the drop test.

(1) Testing of plastic drums, plastic jerricans, plastic boxes other than expanded polystyrene boxes, composite packagings (plastic material), and combination packagings with plastic inner packagings **other than plastic bags** intended to contain solids or articles must be carried out when the temperature of the test sample and its contents has been reduced to -18°C (0°F) or lower. Test liquids must be kept in the liquid state, if necessary, by the addition of anti-freeze. Water/anti-freeze solutions with a minimum specific gravity of 0.95 for testing at -18°C (0°F) or lower are considered acceptable test liquids. Test samples prepared in this way are not required to be conditioned in accordance with [§ 178.602\(d\)](#).

Should this be the same as they are inner packaging containing solids or articles?

If you would kindly provide clarity on this issue, we would greatly appreciate it. Please feel free to reach out with any questions or for further clarification.”

Thank you,

Rafael Cameron
UN DOT Manager



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