



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

June 25, 2026

Mr. Jeff Bittner
Technical Sales Representative
Acme Corrugated Box Co., Inc.
2700 Turnpike Drive
Hatboro, PA 19040

Reference No. 26-0037

Dear Mr. Bittner:

This is in response to your January 21, 2026 email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to United Nations (UN) specification packaging. In your email, you describe a scenario involving corrugated boxes manufactured by your company. You state that during recent recertification testing, the testing laboratory identified that the most recent production samples utilized a 42-pound middle liner instead of the 26-pound liner specified in the previous test report. You further state that these upgraded boxes—reflecting the new paper combination—were subsequently tested successfully as a UN standard package, and a new test report was issued. Specifically, you request written acknowledgment that your boxes are approved for use as a UN specification packaging.

Please note that PHMSA does not explicitly “approve” standard UN specification packagings. In accordance with § 178.601(b), “[i]t is the responsibility of the packaging manufacturer to assure that each package is capable of passing the prescribed tests.” When a change is made to a packaging design, such as upgrading the middle liner from 26-pound to 42-pound, it may constitute a new or different “design type” under § 178.601(c)(4), which requires design qualification testing. Because the test lab successfully tested the new design type containing the 42-pound liner and documented it in the provided January 7, 2026 test report, the design qualification requirements appear to have been met.

I hope this information is helpful. Please contact us if we can be of further assistance.

Sincerely,

A handwritten signature in blue ink that reads "Alexander Wolcott".

Alexander Wolcott
Acting Chief, Regulatory Review and Reinvention Branch
Standards and Rulemaking Division



26-0037
Pollack

FW: UN Certified Carton

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

Wed, Jan 21, 2026 at 3:54 PM

Good afternoon,

I have called and spoken to Mr. Bittner about this situation and reached out to Ryan Larson for guidance. Mr. Bittner indicated he wanted a response in writing so I am submitting this interpretation request on his behalf. Let me know if you need anything else.

Best,

Aminah

From: Jeff Bittner <JBittner@acmebox.com>
Sent: Wednesday, January 21, 2026 8:11 AM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Subject: UN Certified Carton

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

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Good morning,

I have spoken several times with Amina at PHMSA regarding a box that was identified as inconsistent with a previous test report when recertification was underway. I have attached copies of both test reports.

Amina and I spoke on January 21, at which time she told me that the boxes in question can be used as they are since performance has been validated under the current test report.

Here are the key points:

- Acme Corrugated has been making this box for Champion Container for years.
- During the recent recertification testing that was completed for the report published earlier this month, box samples were pulled from the most recent production order. T-MAK, the testing lab, identified that the middle liner of the box did not match the previous report . Instead of a 26# liner (tested at 27.4), a 42# liner was used instead (heavier than specified). The box was upgraded for some unknown reason.
- The new report (1/7) reflects the paper combination of the boxes in question, tested successfully as part of the UN package. CO number was 3010 on previous report and is now 4125 on the new one.

I am requesting acknowledgement in writing that the boxes in question are approved for use. Our customer will need this for their records.

I appreciate your assistance with this matter. Please let me know if there are any questions. I can be reached by email or by contact information below.



Jeff Bittner

**Technical Sales
Representative**

(direct) 215-444-8049

(cell) 267-481-3610

A Century of Innovation and Service

Acme Corrugated Box Co., Inc.

2700 Turnpike Drive, Hatboro, PA 19040

acmebox.com

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