



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

April 1, 2021

Erin Sineath
Global Manager of Dangerous Goods
XPO Logistics – Supply Chain
4043 Piedmont Parkway
High Point, NC 27265

Reference No. 21-0021

Dear Ms. Sineath:

This letter is in response to your March 4, 2021, letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the definition of a “different packaging.” Specifically, you indicate that closure instructions for a UN Specification 4G (fiberboard) packaging require the use of “3/16-inch Anti-Static Bubble wrap” for assembly. You ask whether it would be permissible to purchase a bubble wrap from another vendor, as long as the same design specifications have been met.

The answer is yes. In accordance with § 178.601(c)(4), “a *different packaging* is one that differs (i.e., is not identical) from a previously produced packaging in structural design, size, material of construction, wall thickness or manner of construction.” Therefore, having the bubble wrap manufactured by a different person does not automatically constitute a different packaging. However, please note that if the bubble wrap differs in design specification, it would constitute a different packaging.

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

Sincerely,

Emonn Patrick for

Dirk Der Kinderen
Chief, Standards Development Branch
Standards and Rulemaking Division

Geller

20-0021

From: [INFOCNTR \(PHMSA\)](#)
To: [Hazmat Interps](#)
Subject: FW: Request for Formal Interpretation
Date: Friday, March 5, 2021 11:40:19 AM
Attachments: [DOT Interp ESD Bubble Wrap.pdf](#)

Hello,

Attached is a request for letter of interpretation.

Thanks,

Jonathon, HMIC

From: Erin Sineath [mailto:Erin.Sineath@xpo.com]
Sent: Thursday, March 4, 2021 4:53 PM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Subject: Request for Formal Interpretation

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.

Dear Hazmat Info Center,

Attached you will find a request for formal interpretation. Thank you in advance for your assistance.

Erin N. Sineath
Supply Chain
Global Manager of Dangerous Goods

XPOLogistics
4043 Piedmont Parkway
High Point, NC 27265 USA
O: +1 336-217-3698 M: +1 336-906-4842