U.S. Department
of Transportation
**Research and
Special Programs
Administration**

400 Seventh St., S.W.
Washington, D.C. 20590

FEB 2 8 2001

Mr. Erik Martinsen
Technical Service Engineer
B Way Corporation
P.O. Box 336
Homerville, GA 31634

Ref. No: 01-0052

Dear Mr. Martinsen:

This is in response to your February 15, 2001 letter requesting clarification on the package testing requirements of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically you ask whether it is necessary to physically vent a packaging to reach equilibrium after performing the drop test prescribed in § 178.603.

The answer is no. It is not necessary to physically vent a packaging to reach equilibrium. However, before it can be ascertained whether the packaging passed or failed the drop test the packaging must reach equilibrium (see § 178.603(f)(1)).

I hope this information is helpful.

Sincerely,

for Dinah Gruby
John A. Gale
Transportation Regulations Specialist
Office of Hazardous Materials Standards

010052

B-WAY Corporation

February 15, 2001

Lavalle
§178.603
Testing
01-0052

Jeff Furr
US DOT
fax: (202) 366 3012

re: UN/POP Drop Test Procedure

Dear Mr. Furr:

As we discussed on the telephone, attached is a letter of interpretation from RSPA to Cleveland Steel Container Corp. dated August 24, 1993. The letter was found at Labelmaster Corporation's 49Online website in the DOT Letters of Interpretation section.

Question and answer two are about the criteria for passing the UN/POP drop test as specified in 49CFR 178.603(f)(1). The answer states that after the drop test is done "it is not necessary to physically vent packaging to achieve equilibrium." We understand this to mean that after the drop test the package must be inspected. If there is no sign of leakage the package is deemed to have passed the drop test.

This interpretation appears to be reasonable to us since we understand that the UN/POP drop test is intended to simulate what would happen in a real world shipping environment. In that context we believe the package would not be vented after being dropped, but would continue enroute to it's ultimate customer in this dented but non-leaking state. Is this a current and accurate interpretation?

Your help will be appreciated in resolving this matter for us so that we can provide the most cost-effective packaging for our customers while complying with the letter and intent of 49CFR.

Sincerely,

Erik Martinsen
Technical Service Engineer

attachment: CSC Corp. Letter Dated 3/16/93
US DOT Response Dated 8/24/93