



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

JUL 29 1999

Mr. Robert J. Ten Eyck
TEN E Packaging
1666 County Road 74
Newport, MN 55055

Ref. No: 98-0350

Dear Mr. Ten Eyck:

This is in response to your letter dated November 23, 1998 regarding the use of the hot water bath for aerosol products in 49 CFR 173.306(a)(3)(v).

As provided by § 173.306(a)(3)(v), each container must be subjected to a test performed in a hot water bath. The temperature of the bath and the duration of the test must be such that the internal pressure reaches that which would be reached at 55 °C or 50 °C if the liquid phase does not exceed 95% of the capacity of the container at 50 °C. We would view either water bath temperature as acceptable.

I hope this satisfies your request.

Sincerely,

Thomas G. Allan
Senior Transportation Regulations Specialist
Office of Hazardous Materials Standards



980350

173.306



Setting the Standard

GALE
\$173,306
98-0350

November 23, 1998

Edward Mazzullo
Office of Hazardous Materials Standards
DHM-10
U.S. DEPARTMENT OF TRANSPORTATION
Research and Special Programs Administration
400 Seventh Street S.W.
Washington, DC 20590

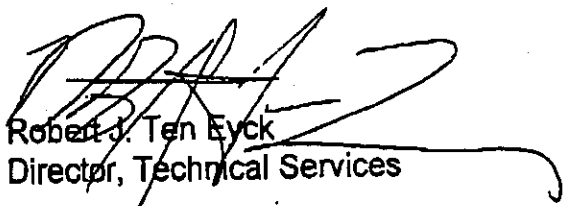
Dear Ed:

I am writing to request an interpretation on the use of the hot water bath for aerosol products found in Section 173.306(a)(3)(v) of Title 49 CFR. We would like the agency's confirmation that it views the 55° C or 50° C water bath temperatures as equivalent in screening cans for proper filling and assembly.

We would also like to know why the 50° C temperature condition ties the aerosol can's liquid phase to a maximum capacity of 95% but the 55° C temperature condition has no maximum capacity requirement.

Your input on this regulatory matter is greatly appreciated.

Sincerely,


Robert J. Ten Eyck
Director, Technical Services

*No response to
this necessary, per
Mr. Ten Eyck.
RAB.*

TEN-E Packaging Services Inc.
1666 County Road 74
Newport, Minnesota 55055
email: info@ten-e.com
web: www.ten-e.com

651 459 0671 651 459 1430

