



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

FEB 10 1998

Mr. Mark T. Hughes
Senior Packaging Research Engineer
Signode Packaging Systems
3640 West Lake Avenue
Glenview, Illinois 60025

Dear Mr. Hughes:

This is in response to your letter, and telephone conversation with Diane LaValle of my staff, requesting clarification on the definition of non-bulk composite packagings regarding the use of flexible plastic woven bags under the Hazardous Materials Regulations (HMR; 49 CFR parts 171-180). Specifically, you describe a flexible woven plastic bag which has corrugated fiberboard sewn between the layers of woven material to provide rigidity and a 3 mil. plastic liner and ask if it may be described as a UN 6HH1 composite packaging (i.e., a plastic receptacle within a protective plastic drum).

The answer is no. A packaging certified as a UN 6HH1 must be constructed as provided in § 178.509 (Standards for plastic drums and jerricans). However, as provided in § 178.601(h), a packaging having specifications different from those in §§ 178.504-178.523 may be used if approved by the Associate Administrator for Hazardous Materials Safety. Such packagings must be shown to be equally effective and the testing methods used must be equivalent.

I hope this information is helpful.

Sincerely,

Delmer F. Billings
Chief, Regulations Development
Office of Hazardous Materials Standards

171.8



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Delmer F. Billings
Chief, Regulations Development
Office of Hazardous Materials Standards



980373

SIGNODE PACKAGING SYSTEMS

3640 West Lake Avenue
Glenview, Illinois 60025
Telephone (847) 724-6100
Telephone 1-800-722-5523
Fax (847) 657-5365
<http://www.ezone.com/signode>

LaValle
File: 171.8 Bag, Drum
SC: 510, 300

SIGNODE®

June 10, 1997

Ms. Diane LaValle, DHM-11
U.S. Department of Transportation
Office of Hazardous Materials Safety
Regulations Development, DHM-11
400 Seventh Street, S.W.
Washington, D.C. 20590

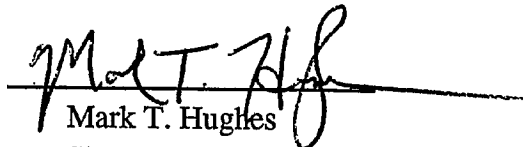
Dear Ms. LaValle:

Thank you for following up our conversation on the definition of non bulk composite packagings in relation to the utilization of a flexible plastic woven bags. My customer has submitted that a flexible plastic woven bag could fall under the classification of a Composite Package - 6HH1 (Plastic Drum with a Plastic Receptacle Inner Packaging). He has submitted the Flexible Woven Plastic Bag with a 3 mil. Plastic Bag Insert (Capacity 4 cu. ft. bag - 250 lb., 8 cu. ft. bag - 800 lb.). The plastic bag insert is secured closed with a plastic tie or a steel tie. The flexible bag has corrugated sewn between the layers of woven material to provide rigidity for loading. The flexible bag has woven material tie offs sewn around the closure to secure the bag closed.

I have gone through the regulations and can not find a defining regulation that would not allow him to classify this assembly as a Composite Package (6HH1). Although the spirit of the regulations would define this product as a flexible bag, I request your assistance in a final ruling on the matter.

Thank you for your time and assistance.

Very Truly Yours:



Mark T. Hughes
Signode Packaging Research Laboratory
Senior Packaging Research Engineer
847-657-4382

Facsimile Cover Sheet

To: Bob Richards
Company: U.S. D.O.T.
Phone: 202/366-0656
Fax: 202/366-5713
3753

From: Mark Eubank
Company: B.A.G. Corp.
Phone: 214-340-7060
Fax: 214-340-4598

Date: July 21, 1997
Pages including
this one: 3

COMMENTS:

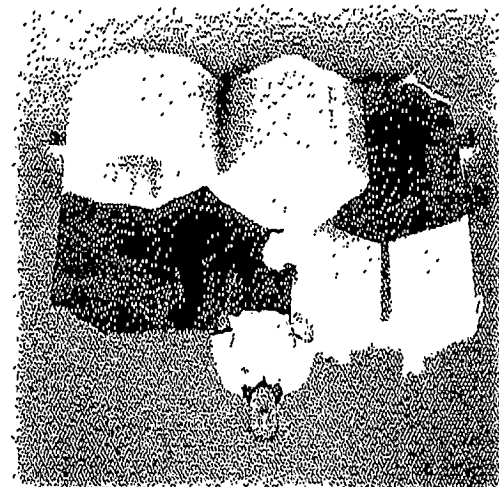
Bob, following are two pieces of literature for our containers that we trying to categorize as 4H2 solid plastic box. We can find nothing that excludes our package from being called this. The corrugated Stiffeners which are sewn into the plies allow the container to stand by itself. All performance requirements have been met and we are waiting a written opinion from the DOT for final third party testing. I will follow-up with a phone call Thurs. July 24.

2ND
ATTEMPT

See attached Plastic box
DEL
134H3
134H3
134H3
134H3
134H3

Bob
Di
Ed
Hochman

We have a container to
meet your every need.



The Super Sack[®] Container

ECONOMICAL LAND FILL CONTAINERS

- 27 cubic foot volume
- 2,200 pound weight capacity
- UN certified for Group II and III
- Includes a 3 mil HDPE liner
- Full open top, web tie closure
- Flat bottom, no discharge
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- Lightweight design

Call B.A.G. Corp. for all of your bulk packaging needs. B.A.G. Corp. is the only source for the original Super Sack[®] container. Call us today to learn how our products can save you time, space and money.

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Dallas, TX 75218

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214/340-4598 (Fax)

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Anything a drum can do, the FlexDrum™ Flexible Container can do better! Designed to take the place of metal drums, fiber drums or boxes.



Facts:

- Volume of 8.5 cubic feet (equals a 55 gallon drum)
- Weighs less than 10 pounds
- Weight capacity of 800 pounds
- U.N. certified for Class II & III hazardous waste
- PE liner, 3.0 mil included, other options available
- Self supporting construction
- Ships and stores collapsed
- Acceptable for incineration

Call us today for quality solutions and expert technical support.

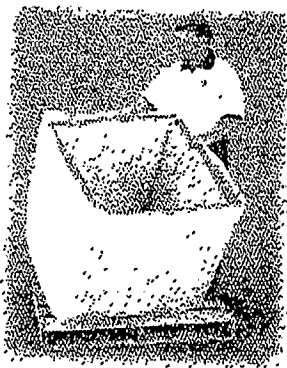
The FlexDrum™ container is free-standing because of its unique, patented construction.



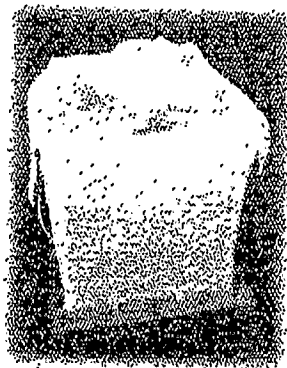
11510 Dala Drive, Dallas, Texas 75218
800/331-9200 • 214/340-7060 Fax: 214/340-4598



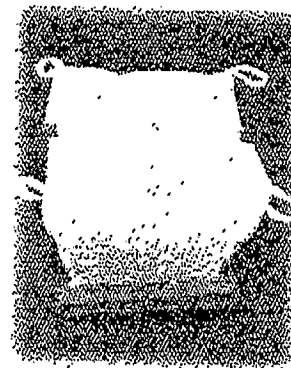
WASTE AWAY™ CONTAINERS



Includes Stiffeners For Stability



Secondary Closure Designs Available



Superior Protection When Closed

THREE BASIC MODELS AVAILABLE

CLASSIC

Our basic design

- 27 cu/ft capacity.
- Self supporting with veneer stiffeners.
- Full open top, with web tie closure.
- Four, ten inch lifting loops - UN certified for Group II and III.
- Rated for loads up to 2,500 lbs.
- Folds flat for shipment and storage.
- Includes 6 mil black, LLDPE/HDPE blend liner, pre-inserted.

PLUS

Identical features to the Classic with the following added benefits:

- Includes triple wall corrugated stiffeners.
- Can be double stacked.
- Includes a single flap protective cover in addition to the open top.
- Includes four tabs for securing container to a pallet.

SUPER

Identical features to the Plus with the following added benefits:

- Uses a four panel protective top in addition to the standard open top.
- UN certified for Group I, II, and III.

Corrugated stiffeners allow for double stacking with the Plus & Super versions.



FLEXDRUM™ CONTAINERS

Designed to replace fiber & steel drums.

CLASSIC

- 8 cu/ft capacity.
- Rated for loads of up to 800 lbs.
- UN certified for Group II and III.
- Folds flat for shipment and storage.
- Full open top, web tie closure.
- Includes 3 mil black, HDLL liner, pre-inserted.
- Veneer stiffeners for support.



PLUS

Identical to the Classic FlexDrum™ container with additional added benefits:

- Triple wall corrugated stiffeners provide a more rigid container.

5 Cubic Foot Model Available

All products in stock - ready to ship. We accept Visa & MasterCard.
Call 1-800-331-9200 for more information on our complete line of containers.

lunar-jose-neck-
use plastic

insert into one end
can't come out

top of side 2 links
of webbing gathered
into jose neck

18 June 1997



DIANE,



HERE IS THE OCCASION,
SURE LOOKS LIKE A DRUM!



Mark

competitor

approval
§ 178.601(h)

178.801(i) need

sample bag
~~fully enclosed!~~
zip cover

zip cut for
1/20

FlexDrum™

FLEXIBLE CONTAINERS

Anything a drum can do, the FlexDrum™ Flexible Container can do better! Designed to take the place of metal drums, fiber drums or boxes.



Facts:

- Volume of 8.5 cubic feet (equals a 55 gallon drum)
- Weighs less than 10 pounds
- Weight capacity of 800 pounds
- U.N. certified for Class II & III hazardous waste
- PE liner, 3.0 mil included, other options available
- Self supporting construction
- Ships and stores collapsed
- Acceptable for incineration

Call us today for quality solutions and expert technical support.

The FlexDrum™ container is free-standing because of its unique, patented construction.

**B.A.G.
CORP.**
SINCE 1969

11510 Data Drive, Dallas, Texas 75218
800/331-9200 • 214/340-7060 Fax: 214/340-4598

Member
Fibca Flexible Intermediate Bulk
Container Association

This and other products manufactured by B.A.G. Corp. and Super Sack Mfg. are protected by one or more of the following patents: 4,143,796; 4,194,652; 4,224,970; 4,253,507; 4,340,379; 4,457,456; 4,479,243; 4,691,371; 4,759,473; 4,811,419; 4,833,008; 4,865,218; 4,878,600; 4,903,859; 4,909,410; 4,917,268; 5,056,571; 5,076,710; 5,158,367; 5,158,369; 5,165,802; 5,203,633; 5,230,689; 5,244,281; 5,458,418; 5,490,828; 5,503,517; Other patents pending.

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