



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

JAN 29 1998

Mr. Dwight Baker
Chemical Engineer
International Compliance Center
205 Matheson Blvd E. Unit 7
L4Z 1X8
Mississauga, Ontario, Canada

Dear Mr. Baker:

This is in response to your letter dated October 22, 1997, requesting clarification on the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if a "RingLok" (a plastic circular ring) used to reinforce the seal of a paint can lid meets the requirement for a positive (not friction) means of closure as specified in § 173.187(a) of the HMR.

Based on the photographs and sample paint can with a "RingLok" you provided, it is the opinion of this Office that the "RingLok" meets the requirement for a positive (not friction) means of closure as specified in § 173.187(a).

I hope this answers your inquiry. If you need additional assistance, do not hesitate to contact us.

Sincerely,

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



INTERNATIONAL COMPLIANCE CENTER LTD.

December 9, 1997

DEBBIE BOOTHE
Research Special Programs
Administration, Office Hazardous
Materials Standards
DHM-10
400 7th St, Southwest
Washington, D.C. 20590

D. Boothe,

As per our conversation during Dec 9 th, 97, I am seeking a written interpretation for a passage of the 49 CFR.

I wish to know if a RingLok (a plastic circular ring) used to reinforce the seal that a paint can lid has with a can, meets the definition of a positive means of closure as per part 173.187 (a) of the 49 CFR.

The information you requested, and that which is enclosed, are photographs of our paint can with the RingLok seal. The pictures go back to 1994 and deal with official third party UN package performance tests (Distribution Dynamics Labs), as well as ISTA tests.

Your earliest attention is deeply appreciated!

From the Desk of,

Dwight Baker
Chemical Engineer
International Compliance Center
205 Matheson Blvd E. Unit 7
L4Z 1X8
Mississauga, Ont, Canada.

ONTARIO:	205 Matheson Blvd. E., #7, Mississauga, Ontario L4Z 1X8	Tel.: (905) 890-7227 Fax: (905) 890-7070
QUEBEC:	88 Avenue Lindsay, Dorval, Quebec H9P 2T8	Tel.: (514) 636-8146 Fax: (514) 636-3522
NOVA SCOTIA:	216 Wright Ave., Burnside Ind. Park, Dartmouth, N.S. B3B 1R6	Tel.: (902) 468-8885 Fax: (902) 468-8886
NEW YORK:	2150 Liberty Drive, Unit 2, Niagara Falls, New York 14304	Tel.: (716) 283-0002 Fax: (716) 283-0119
HOUSTON:	10620 Stebbins Circle, Suite D, Houston, Texas 77043	Tel.: (713) 722-0023 Fax: (713) 722-0026



Boothe file: 1731187(a)
SC: 341,
INTERNATIONAL COMPLIANCE CENTER LTD.

October 22, 1997

DIANE LAVALLE
Research Special Programs
Administration
400 7th St, Southwest
Washington, D.C. 20590

D. Lavalle,

As per our conversation during the week of Oct 14 th, 97, I am seeking a written interpretation for a passage of the 49 CFR.

I wish to know if a RingLok (a plastic circular ring) used to reinforce the seal that a paint can lid has with a can, meets the definition of a positive means of closure as per part 173.187 (a) of the 49 CFR.

As per our earlier conversation you had indicated that it does meet the definition.

Your earliest attention is deeply appreciated!

From the Desk of,

Dwight Baker
Chemical Engineer
International Compliance Center
205 Matheson Blvd E. Unit 7
L4Z 1X8
Mississauga, Ont, Canada.

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Tel.: (713) 722-0023 Fax: (713) 722-0026





ISTA PASSED
NO LEAKAGE

NS Gale Ice

PROFORMA INVOICE

FORM 1007

PROFORMA INVOICE

NAME AND ADDRESS OF EXPORTER
Icc Ltd.
205 Matheson Blvd. E., # 7
Mississauga, Ontario, L4Z 1X8.

U.S. Customs Clearance By



REFERENCE NO.
PAGE 1 OF 1
PAGES 1 OF 1

CORPORATE HEADQUARTERS
1600 W. Lafayette, Detroit, MI, 48216 (313) 965-1540

SHIP TO
Office Hazardous Materials Standards
Research Special Programs Administration
DHM-10, 400 7th St. South West
Washington, DC, 20590.
Attn: - Debbie Boothe.

ORIGIN (COUNTRY/PROVINCE) **Canada/Ontario**
DESTINATION (COUNTRY/STATE) **USA/DC**

TERMS OF SALE - DELIVERY - PAYMENT, ETC.
SHIPMENT DESTINATION OR
PURCHASER'S CUSTOMS CHARGES TO SHIPPER CONSIGNEE **INTCOM9205**

INVOICE DATE **12/09/97**
DATE OF SALE **12/09/97**
CURRENCY OF SALE **US \$**

IF FOREIGN GOODS IN SAFE CONDITION AT IMPORTED GIFT COUNTRY OF ORIGIN

LOCAL CARRIER **UPS**
EXPORTING CARRIER **UPS**
PORT OF ENTRY
NOTIFY **UPS**
FOI **U.S. CUSTOMS CLEARANCE**

MARKS AND NUMBERS NUMBER AND KIND OF PACKAGES, DESCRIPTION OF SHIPMENT
1 Box

PIECES/PACKAGES	DESCRIPTION	WEIGHT	INV UNIT QTY.	INVOICE UNIT PRICE	INVOICE TOTAL
USA 1	1 GALLON CAN - METAL CAN & LID WITH A RINGLOK.				10.00

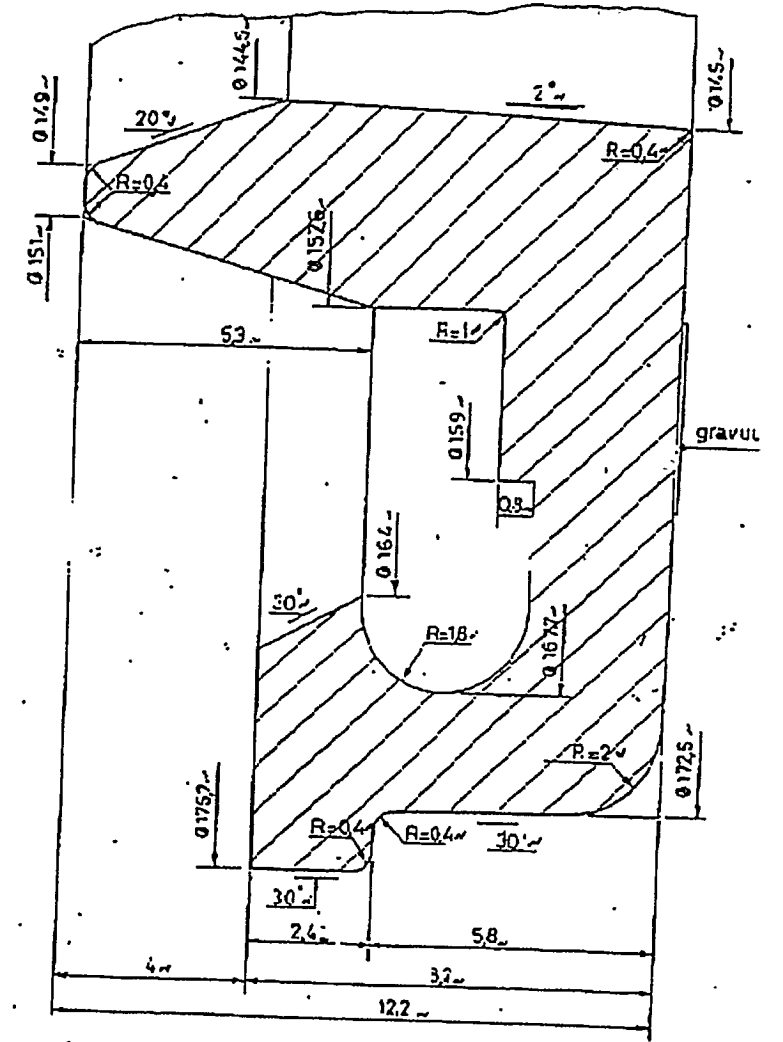
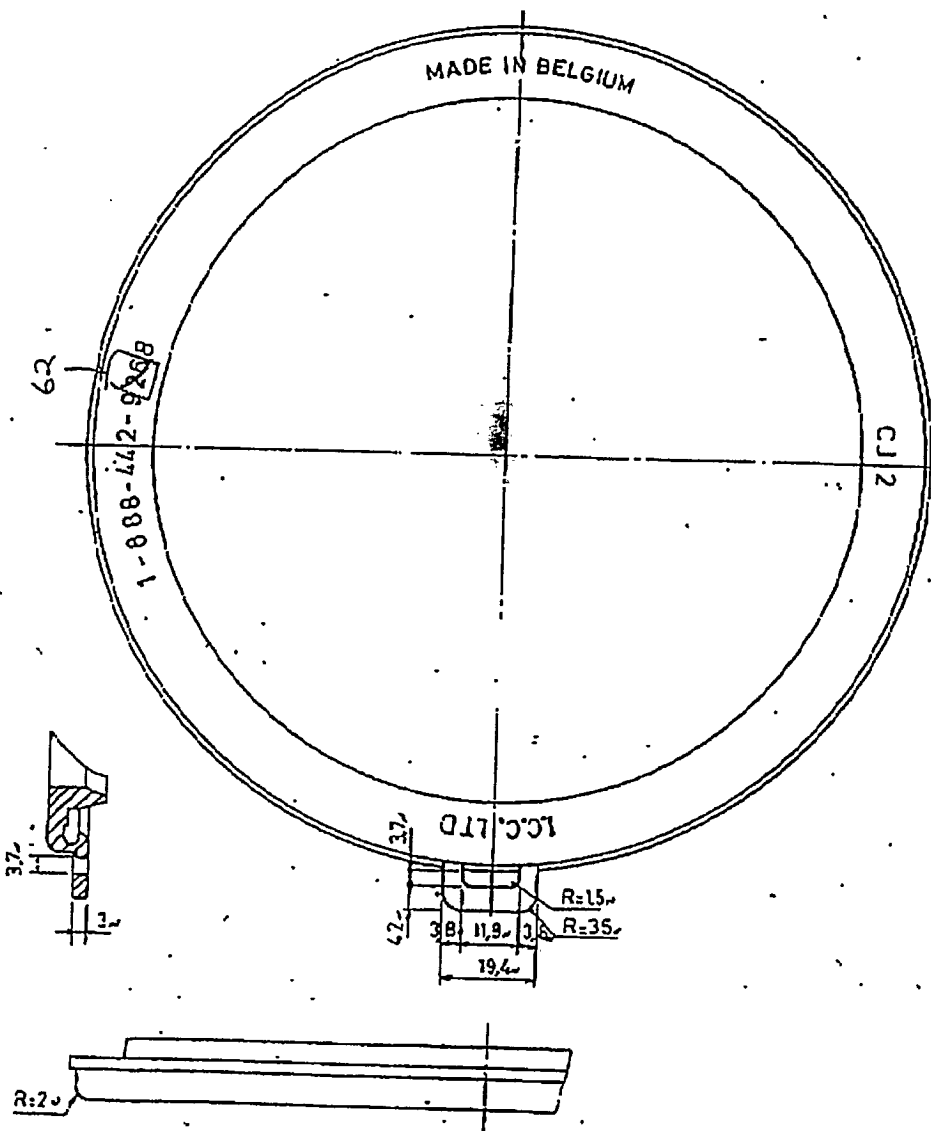
* **GOODS ONLY SENT FOR TESTING PURPOSE ONLY.**
* **VALUE SHOWN IS ONLY FOR CUSTOM PURPOSES.**

EXP # **M-0859** D/A.I.D. **29**
BIN/SHIPPER # **0 515-130**
TAX #
DUTY BROKERAGE FREIGHT
VALUE \$ **10.00**
PKGS of **1** WGT **2 (lb)**
LETTER EXPORT PERMIT NO. IF GOODS NOT SOLD, STATE REASON FOR EXPORT (EXEMPTION, PROCESSING ETC.)
NON DOC STANDARD **TESTING**

DECLARATION BY FOREIGN SHIPPER (To be completed only when the goods described above are not of U.S. origin and their value exceeds \$1200.00)
I declare that the articles herein are the growth, produce or manufacture of the United States; that they were exported from the United States from 19... that they are returned without having been advanced in value or improved in condition by any process of manufacture or other means.

SHIPPER SIGNATURE
TOTAL FREIGHT CHARGES \$
MODE OF TRANSPORTATION FROM POINT OF EXPORT
UPS 3 Day Select
DATE **12/09/97**
SIGNATURE **asadep**

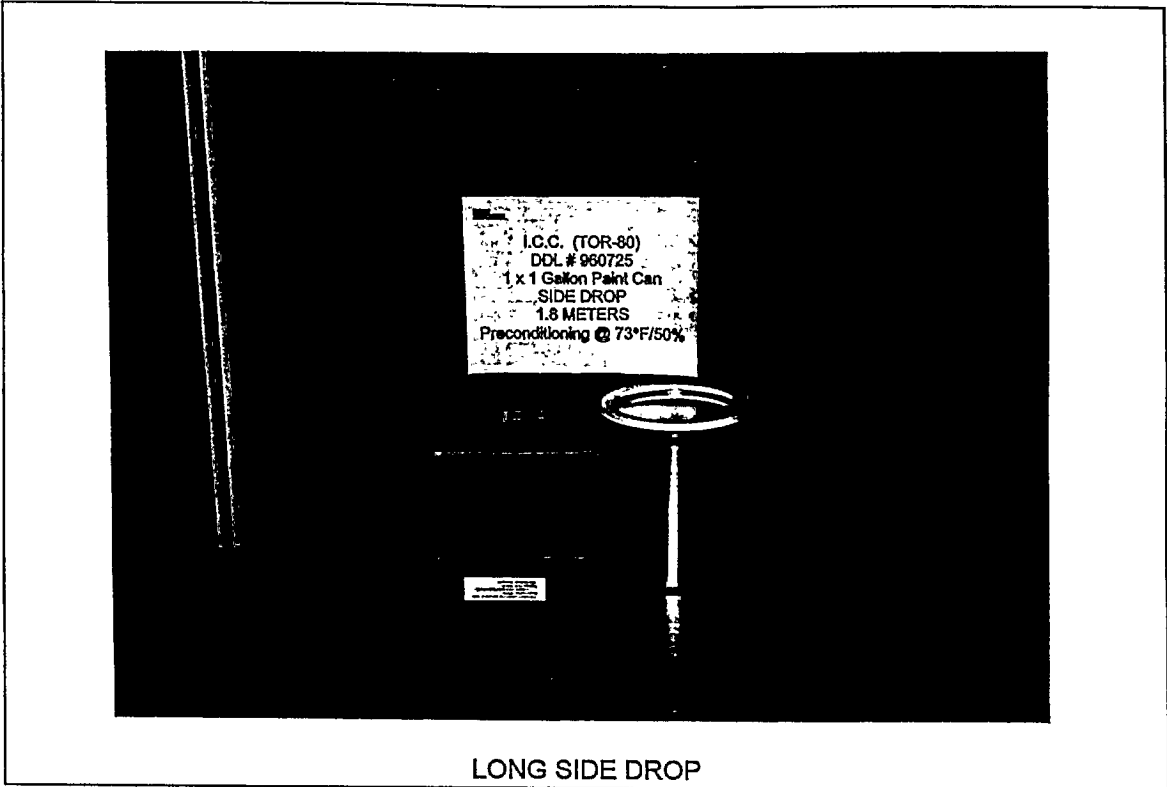
CONTAINER YES NO
INSURANCE
CONTAINER ASSISTS
INVOICE TOTAL



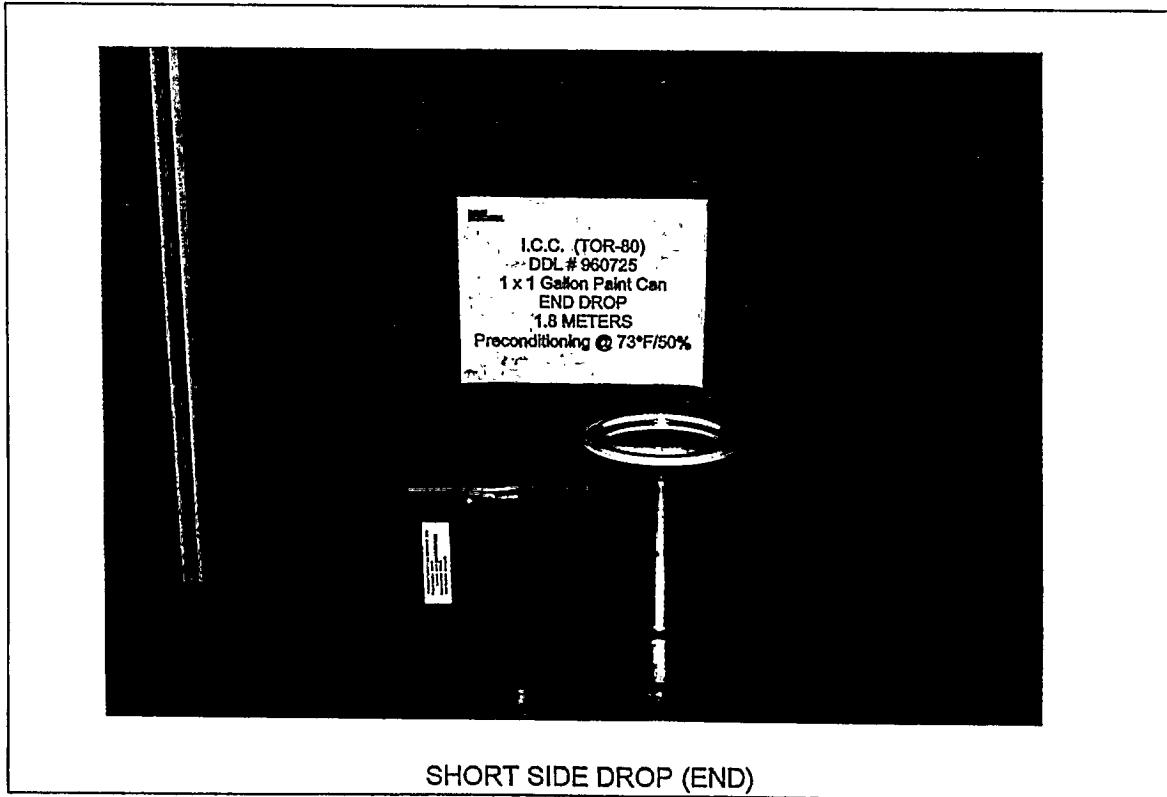
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DATUM: 26-3-97	SCHAAL: 1:1	
PROJECT	GEWICHT: 42 gr	MATERIE: LOPE
	PLAN NR: 397384	

Plastuni

Drop Test (continued)



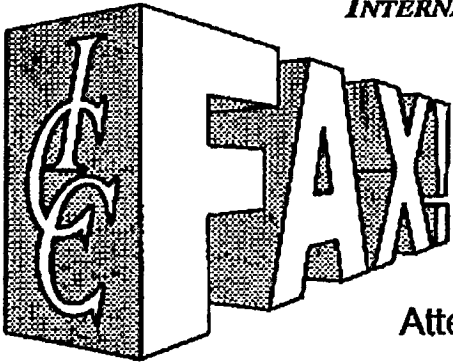
LONG SIDE DROP



SHORT SIDE DROP (END)

001/003

INTERNATIONAL COMPLIANCE CENTER LTD.



Attention: DEBORAH BOOTH

Co. Name: ICC

FAX No. (202) 366-8700

From: DWIGHT BAKER Date: NOV 21, 97

No. of pages including cover sheet: 3

Message: ~~XXXXXXXXXX~~ HERE IS A SPEC.

SHEET ON THE RINGLOCK, AS WELL
AS A PICTURE SHOWING REPRESENTATION
ON ONE OF OUR PACKAGES.

DB

IF YOU DO NOT RECEIVE ALL THE PAGES CALL (905) 890-7227

MISSISSAUGA

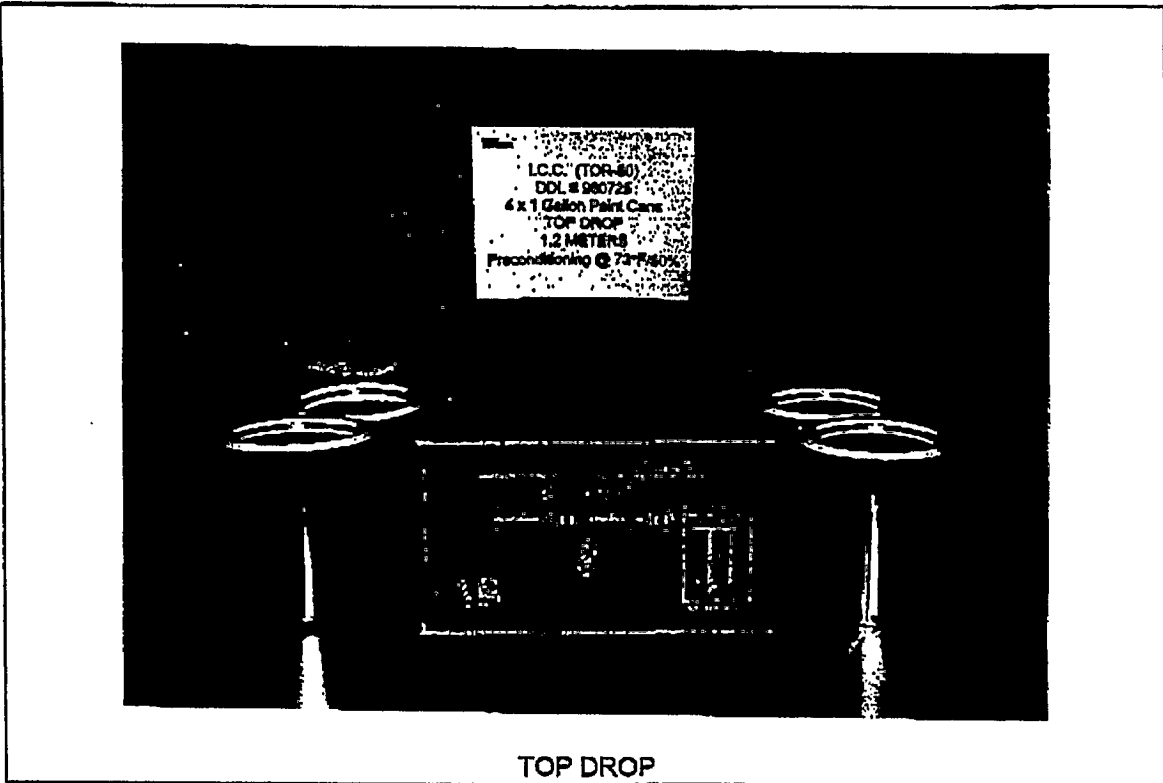
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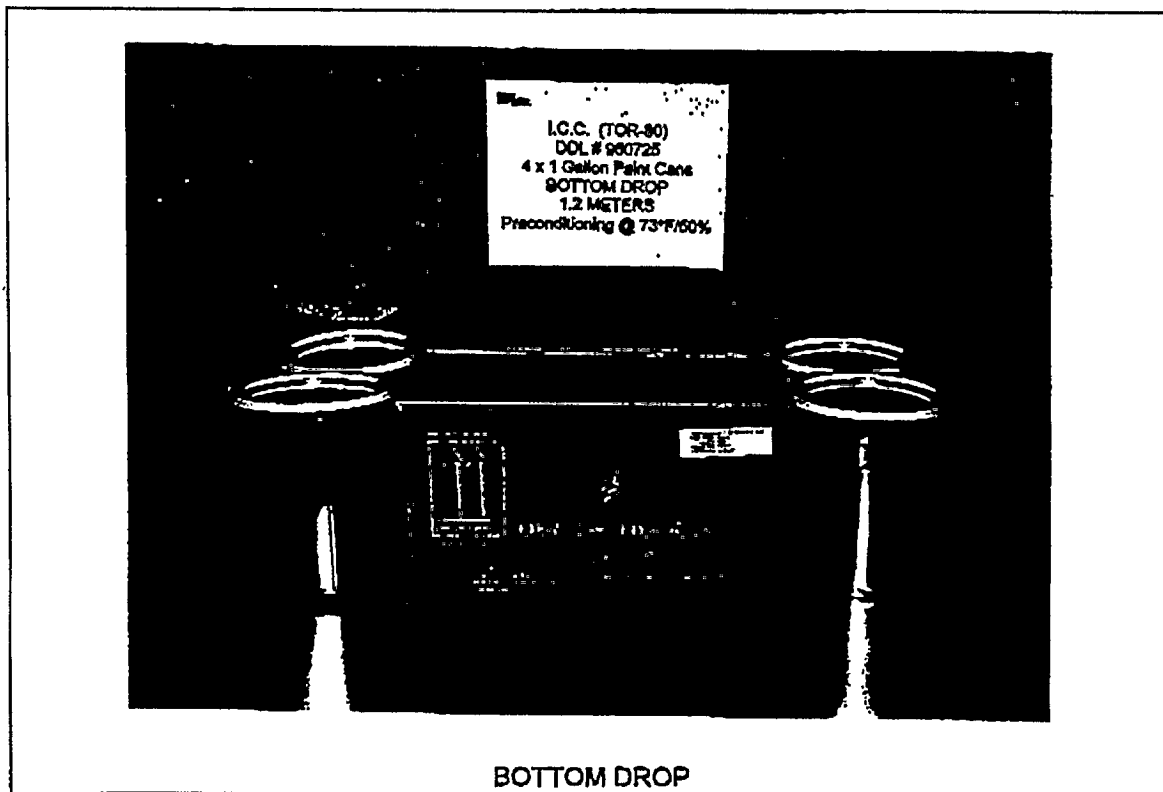
11/21/97

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TEXAS:	10620 Stebbins Circle, Suite D, Houston, TX 77043	Tel.: (713) 722-0023	Fax: (713) 722-0026

Drop Test (continued)



TOP DROP



BOTTOM DROP

11/21/97

15:15

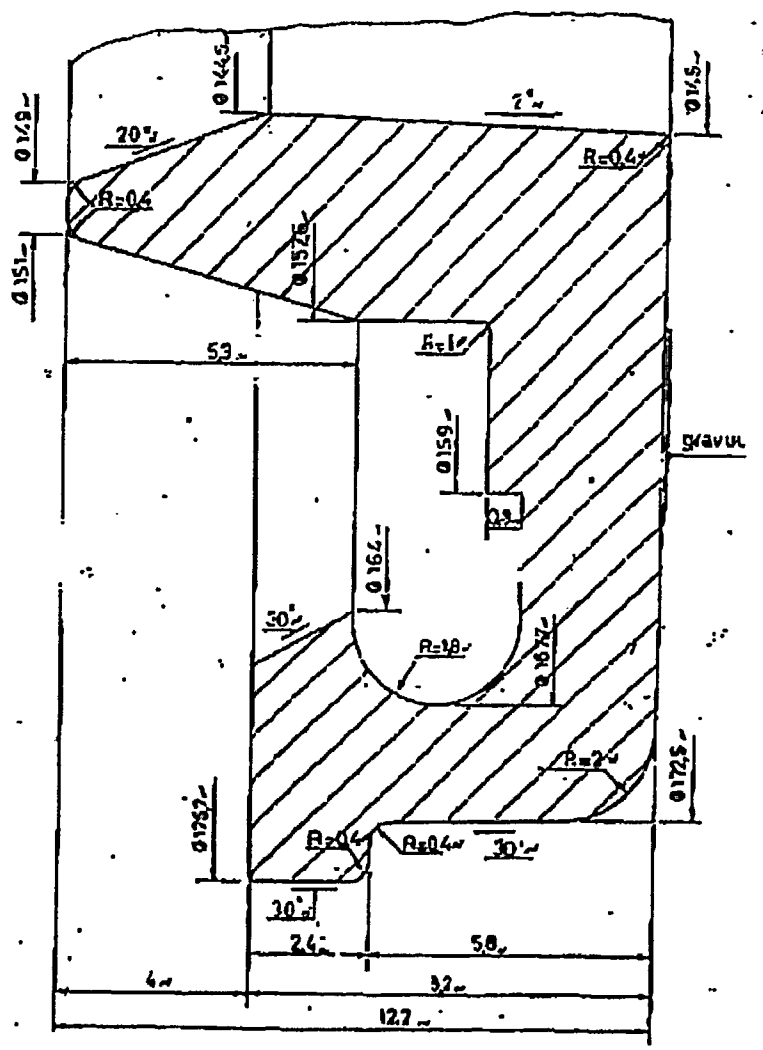
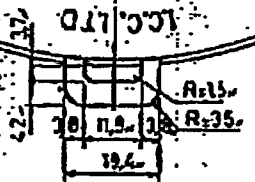
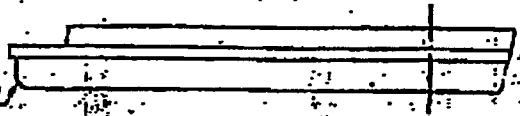
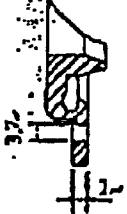
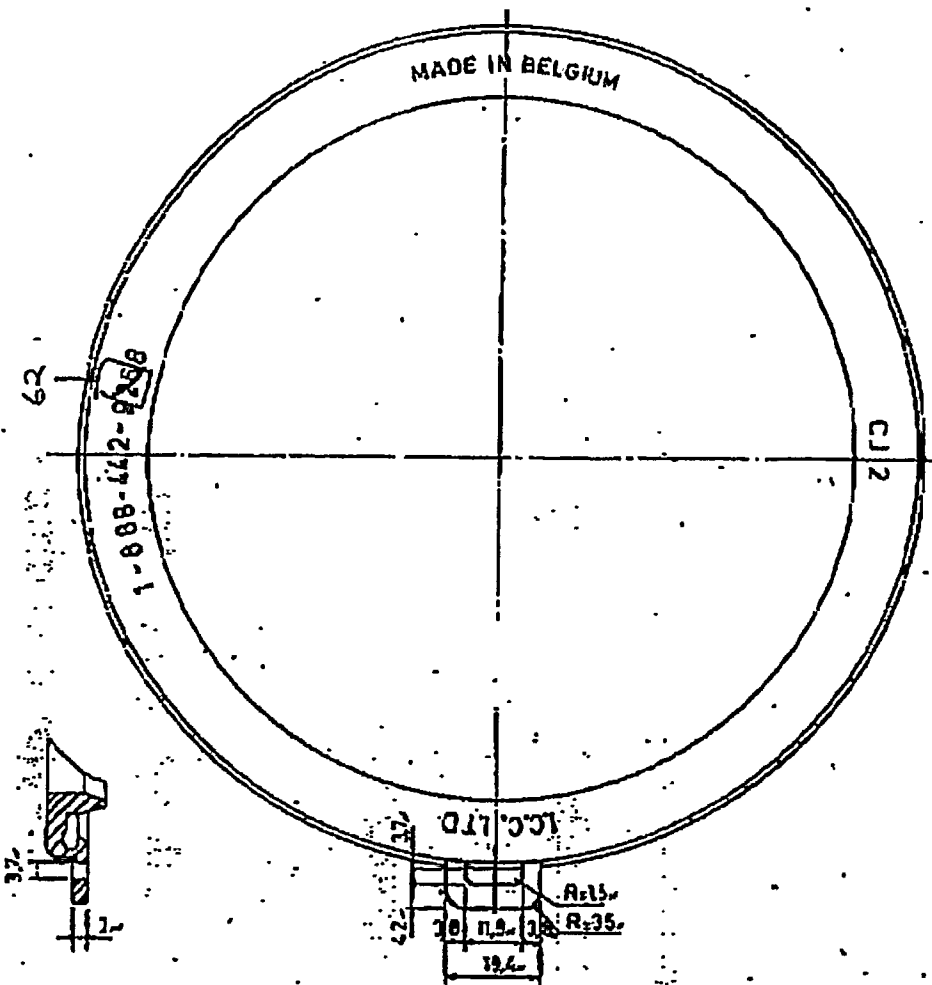
26 MAR '97

89058907070 PLASTUNI NY SA

ICC MISSISSAUGA

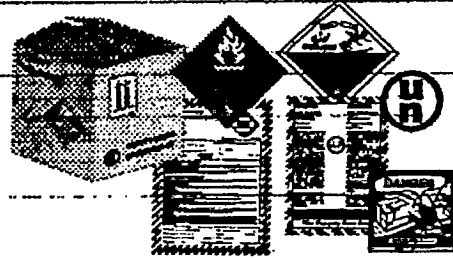
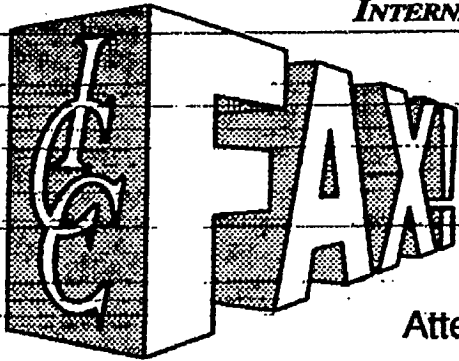
003/003

r.e.c



RING		
DATUM: 26-3-97	SCHAAL: 1:100	
PROJECT	GEWICHT: 42 gr.	MATERIE: LOPE
	PLAN NR: 397384	

Plastuni



Attention: DEBORAH BOOTH

Co. Name: ICC

FAX No. (202) 366-8700

From: DWIGHT BAKER Date: NOV 21, 97

No. of pages including cover sheet: 3

Message: ~~HERE IS A SPEC.~~ HERE IS A SPEC.

SHEET ON THE RINGLOCK, AS WELL

AS A PICTURE SHOWING REPRESENTATION

ON ONE OF OUR PACKAGES.

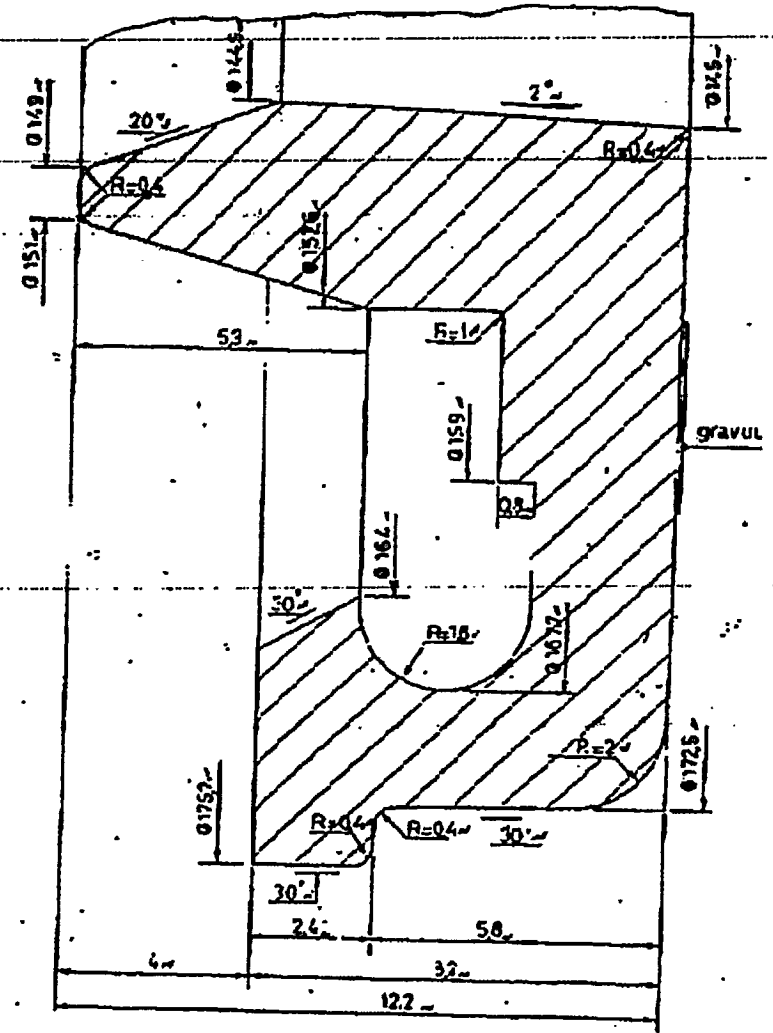
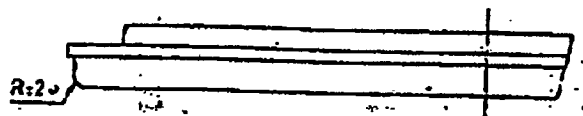
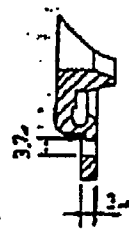
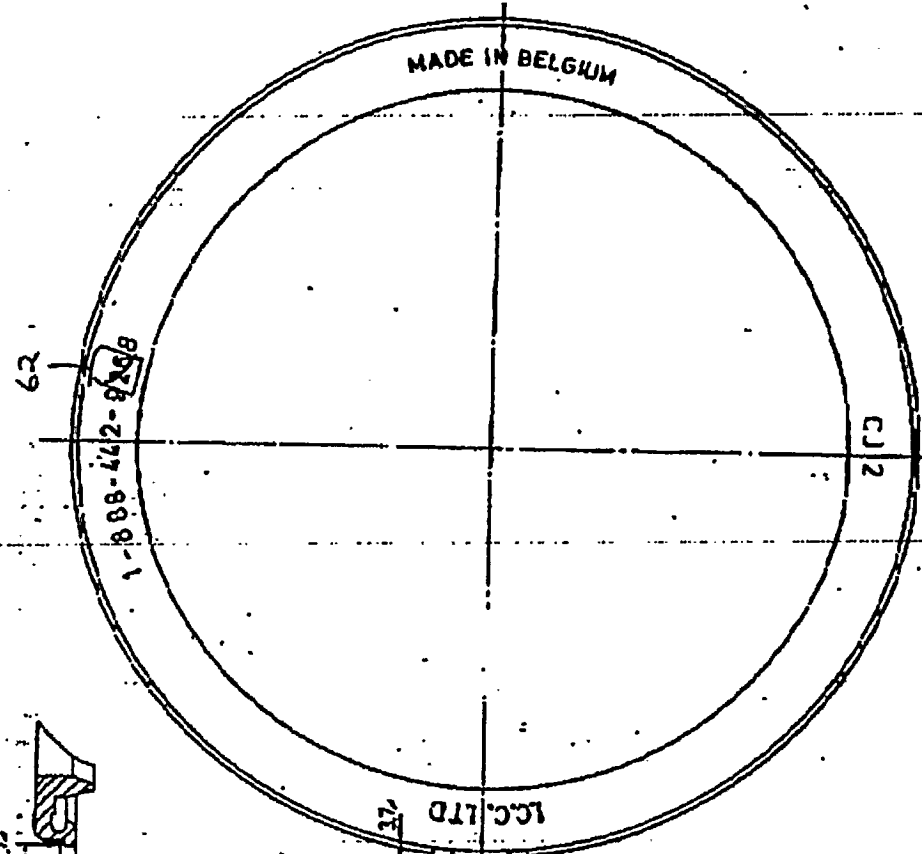
DB

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TEXAS:	10620 Stebbins Circle, Suite D, Houston, TX 77043	Tel: (713) 722-0023	Fax: (713) 722-0026

01
I.C.C. LTD.
7070 890 890 905
15:38 11/21 '97

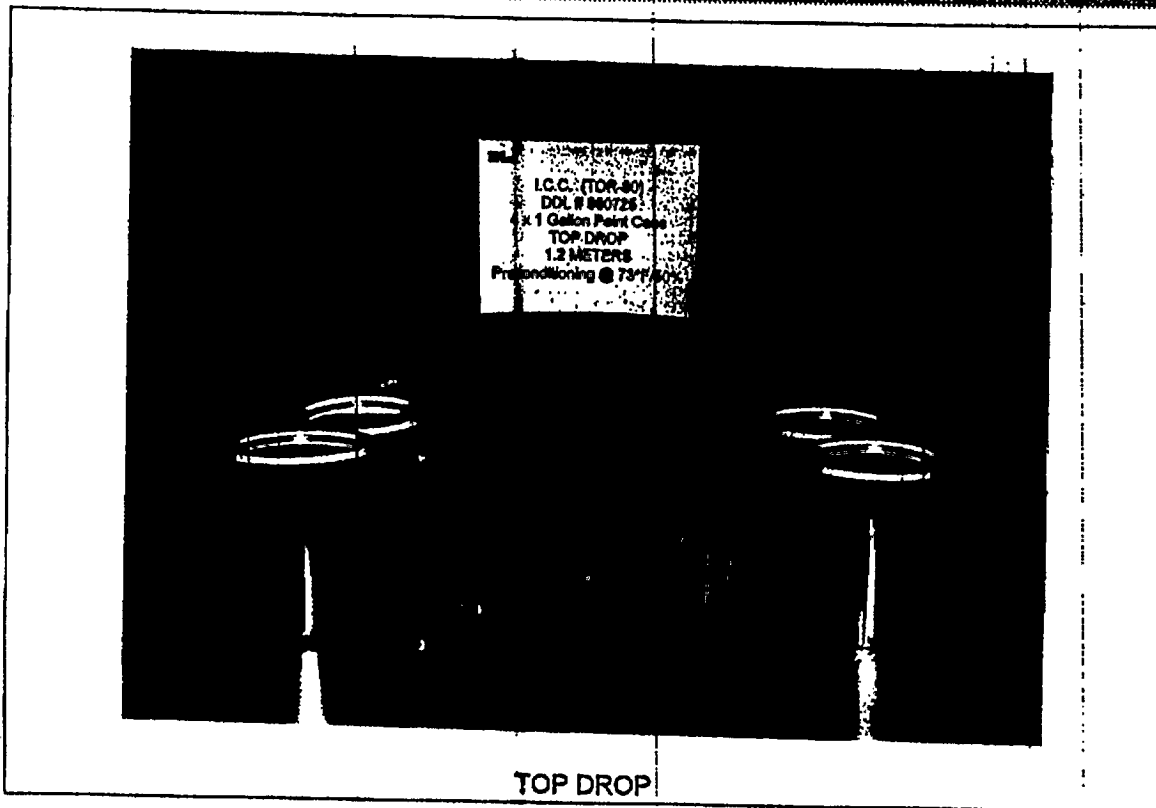
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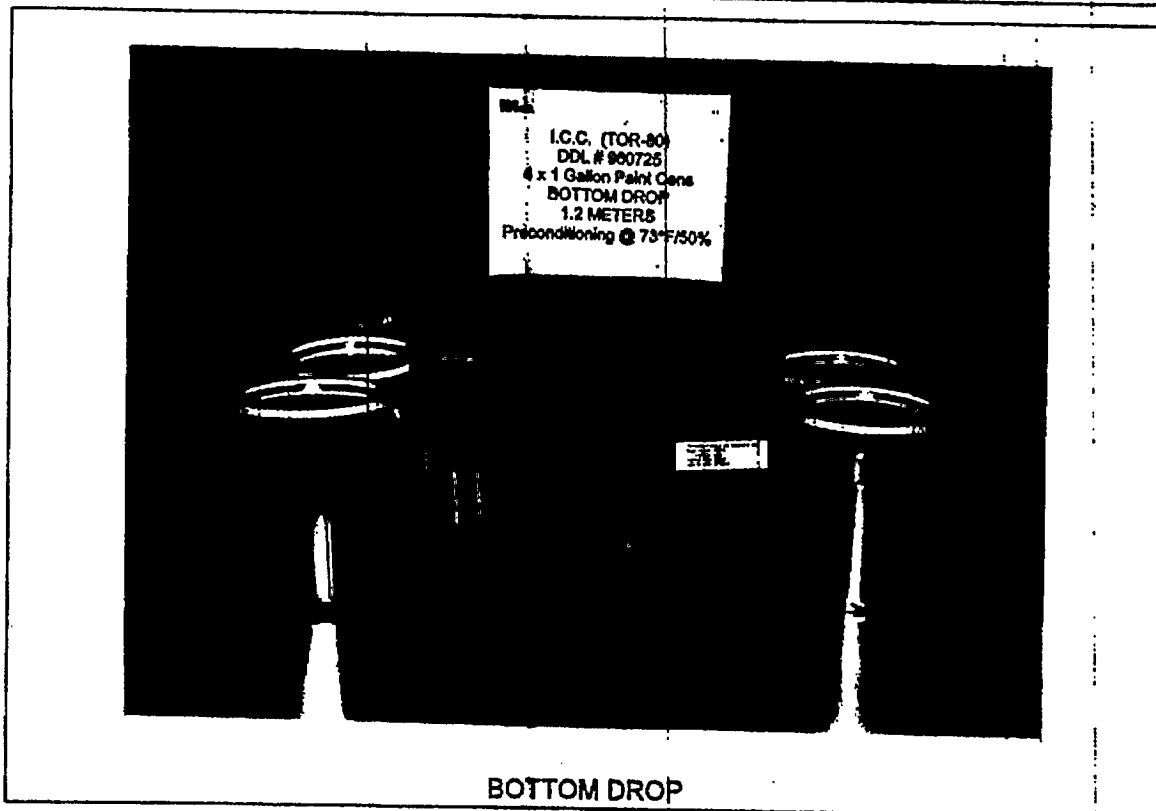
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PROJECT	GEWICHT: 42 gr	MATERIE: LOFE
	PLAN NR: 397364	

Plastuni

Drop Test (continued)



TOP DROP



BOTTOM DROP