



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

MAR 22 1999

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

Ms. Sue E. Pelletier-Bruno
Package Research Laboratories
41 Pine Street
Rockaway, NJ 07866

Ref. No: 99-0005

Dear Ms. Pelletier-Bruno:

This responds to your letter of February 17, 1999, and your conversation with Ms. Diane LaValle of this office concerning requirements for testing specification packagings under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask for confirmation that testing is not considered complete until a test report has been prepared, dated, and signed.

Your understanding is correct. A test report must be completed for each packaging design qualification test and each periodic retest. Section 178.601(1) of the HMR sets forth the information that must be included in each test report. The test report may not be signed and dated until all the required information is compiled and finalized. Completion of a test report is the final step in the packaging design qualification testing or periodic retesting process; thus, no specification packaging may be manufactured for sale or use until a report documenting successful completion of all required tests has been completed.

I hope this information is helpful. If you have further questions, please do not hesitate to contact this office.

Sincerely,

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

178,601



PACKAGE RESEARCH LABORATORY Division of Stapling Machines Co., LLC
41 Pine Street, Rockaway, New Jersey 07866

99-0005
8778.601 Gorsky
(orig)

February 17, 1999

Ms. Diane LaValle
US Dept. of Transportation
400 7th Street South West
RSTA-DHM-10
Room 8102
Washington DC, 20590

Dear Diane:

Thank you for taking the time to review our question today. The head of our lab has requested that we get the answer in writing. I appreciate your time and have repeated the situation below:

We tested combination packages of Corrugated Fibreboard containers and plastic or glass bottles under the provisions of Title 49, Code of Federal Regulations, Section 107.404 (49CFR). The physical tests were completed in December, however the suppliers of their plastic and glass were not able to get the specifications to us until February. Therefore, the cartons were held up awaiting the completion of the gathering of specifications and approval certificate.

As per our conversation on February 17, 1999 you indicated that the tests were not complete until the specifications were compiled and we should put that date on the test date area of the report. I want to clarify that the customer has not been able to manufacture cartons while awaiting the completed reports.

Thank you for your prompt attention and we look forward to receiving your response.

Sincerely,

Sue E. Pelletier-Bruno
Package Research Laboratories



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41 Pine Street, Rockaway, New Jersey 07866

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\$178.601
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400 7th Street South West
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Washington DC, 20580

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Sincerely,

Sue E. Pelletier-Bruno
Package Research Laboratories

Susan -
Per Ed the test
report is dated
when completed
after specs were
received D-

(973) 627-4400

FAX (973) 627-5355



Date: Wednesday, February 17, 1999

To: US Dept of Transportation
Ms. Diane La Valle
Phone: 202-366-6344
Fax: 202-366-3012

From: Package Research Laboratory
Sue E. Pelletier-Bruno
Phone: 973-627-4400
Fax: 973-627-4400

Pages: 2

Subject:

This is the letter dealing with the late specifications..

THANK YOU

Interpretation Letters

Requester Sue E. Pelletier-Bruno

Date Received: 1/5/99

Company Package Research Laboratory

Tracking Number: 99-0005

Phone 973-627-4400

Revision Date: 2/24/99

Date Assigned 2/24/99

Date of Letter 2/17/99

Staff Gorsky

First Draft Due: 3/17/99

Section 178.601

First Draft Date:

Subject Packaging Specs

Concurrence

Status

Status Date

Sign Date

Signor

HBP

Copy to Docket

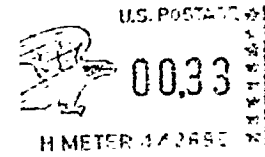
Copy to DHM-60

Comment



Division of Stapling Machines Co.

PACKAGE RESEARCH LABORATORY
41 Pine Street, Rockaway, NJ 07866



US Dept. OF TRANSPORTATION
400 7th Street South West
RSTA-DHM-10
Room 8102
WASHINGTON, DC 20590

