



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

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

JUL 28 2000

Mr. Earl V. Lind
Russell-Stanley
655 Route 202/206
Bridgewater, NJ 08807-1762

Ref No. 99-0254

Dear Mr. Lind:

This is in response to your letter asking whether a UN 3H1 packaging tested under an original design qualification without a "node" is a different design if the packaging is manufactured with a "node". I apologize for the delay in responding and hope it has not caused any inconvenience.

You provided the following scenario:

A change would be made to a UN 3H1 packaging that differs in only a minor respect from the original qualified design. This change would add a small "node" to the top of the container that can be punctured to allow easy emptying of the contents. The customer would be notified at the time of transfer that once the packaging had been punctured to empty the contents, the packaging would no longer be usable for hazardous materials, in effect making it a single use packaging. Except for the 28-day stacking test, design qualification testing has been successfully completed. A stack test was conducted during the periodic retest. The packaging replaces a previous UN 1H1 drum incorporating the puncture vent feature that has been discontinued.

A different packaging is one that differs (i.e., not identical) from a previously produced packaging in structural design, size, material of construction, wall thickness, or manner of construction. A change in a component of a packaging which differ from the original design is a "different" packaging as defined in § 178.601(c)(4). The "UN 3H1" packaging, incorporating the puncture vent feature (i.e., node) for emptying, is a different design type. Such packaging tested without a "node" will not qualify a packaging with a "node" or nodule.

Before a packaging goes into production, the design must be certified through performance of the design qualification tests prescribed in § 178.601(c)(1). A packaging may not be certified and marked as meeting a UN standard unless it has passed all design qualification tests, including the stacking test. The periodic retests is a quality control measure for newly manufactured packagings, and during



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178.601

subsequent production of packagings of that design, periodic retests must be performed at least once every twelve months for single packaging, such as a "UN 3H1," non-removable head jerrican (see § 178.601(e)).

I hope this satisfies your inquiry. If we can be of further assistance, please contact us

Sincerely,

A handwritten signature in cursive script, appearing to read "Delmer F. Billings".

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



RUSSELL-STANLEY
685 Route 202/206, Bridgewater, NJ 08807-1762

TEL: (908) 203-9500 FAX: (908) 203-1940

September 10, 1999

Mr. Edward Mazzullo, Director
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U.S. Department of Transportation
Research and Special Programs Administration
400 Seventh Street, SW
Washington, D.C. 20590 - 0001

Fax: 202-366-3012
2 pages

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§ 178.601
99-0254

Re: Design Qualification Testing - 49 CFR § 178.601 (d)

Dear Mr. Mazzullo,

I am writing on behalf of Russell-Stanley Holdings, Inc., 685 Route 202 / 206, Bridgewater, NJ 08807 - 1762 to request an interpretation regarding the design qualification testing requirement as given in § 178.601(d) for a new or different packaging.

This request is relates to UN 3H1 packagings that differ in minor aspects from the original qualified design.

Specifically, we have made a minor change to meet a customer need. This change is the addition of a small node to the top of the container that the customer can puncture to allow easy emptying of the contents. Once punctured the jerrican is no longer usable for hazardous materials shipments, in effect making it a single use packaging. The customer is to be notified of this according to 49 CFR § 178.2(c).

All design testing as per § 178.601(c) (1) except the 28-day stack test, § 178.606 (c)(1) have been completed successfully. The stack test authorized for the periodic retest § 178.606(c)(2) has been conducted. All tests were successful indicating that the change did not affect performance.

This packaging replaces a previous UN 1H1 drum incorporating the described puncture vent feature that has been discontinued.


The following Russell-Stanley manufacturing site makes, marks and sells this 3H1 jerrican:

Russell-Stanley - Allentown (M-5303)
7132 Daniels Drive
Allentown, PA 18106
610-530-7087 (v)
610-530-7038 (f)

We believe that this interpretation meets the definition of a minor change and does adversely affect safety in transportation of hazardous materials. All design specifications and performance testing has been followed as described above to ensure that packagings made under this approval are in compliance with the regulations.

Due to current customer requirements we would appreciate an early response from you if possible. If you have any questions or need further information in order to expedite this request please do not hesitate to contact me at 908-203-9546.

Thank you in advance for your assistance in this matter.

Sincerely, 

Earl V. Lind
Manager, Technology & Regulatory Affairs

cc: J. Bevilaqua
M. Hunter
G. Lamond