



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

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

FEB 20 2002

Mr. Richard Ruebush
DOT Packaging Coordinator
Exopack Technical Lab
P.O. Box 5687
Spartanburg, SC 29304-5687

Ref. No. 02-0030

Dear Mr. Ruebush:

This responds to your January 7, 2002 letter requesting confirmation of our opinion in a July 12, 1991 letter concerning the term "water resistant" ply used in § 178.521 for a UN5M2 paper bag is still valid. Specifically, you ask whether the previous interpretation of "water resistant" ply used in a UN 5M2 bag is still current.

The answer is yes. It is the opinion of this Office that for purposes of § 178.521, UN 5M2 bag, the term "water resistant" means "waterproof". Wet strength paper which does not resist the penetration of water is not suitable for use as a water resistant barrier.

I hope this answers your inquiry.

Sincerely,

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



020030

178.521



Exopack

3070 Southport Road
Spartanburg, SC 29302
864-596-7140

1-7-02

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§178.521
Packaging
Spec.

Mr. Edward T. Mazzullo, Director
Office of Hazardous Materials Standards
U.S. DOT / RSPA
400 7th Street S.W.
Washington, DC 200590

Dear Mr. Mazzullo:

I am writing to inquire whether your interpretation of the "water resistant" ply used in a 5M2 bag in a 1991 letter still stands as written at that time. Someone has posed the question to me about whether wet strength paper qualifies as the "water resistant" barrier in a 5M2 package. At times an interpretation or opinion may change and I would like to have this point clarified in writing if in fact it is still the case.

I have enclosed a copy of your original letter dated July 12, 1991.

I can be contacted at 864-596-7159 if you need additional information or if a response will be delayed for any reason.

Thank you for your help with this matter.

Regards:

Richard Ruebush

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