



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

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

AUG 27 2002

Ms. Linda Whitton  
Traffic Manager  
AAPER Alcohol  
P.O. Box 339  
Shelbyville, KY 40066-0339

Ref. No. 02-0180

Dear Ms. Whitton:

This is in response to your June 12, 2002 letter, requesting an opinion of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the requirements and standards for cartons. Specifically, you state your company ships Ethyl Alcohol, Class 3 (flammable liquid) in corrugated rectangular cartons and uses corrugated inserts to cover the open area of the inner flaps of your pint cartons. You question if corrugated inserts are a requirement of the HMR. You further indicate your intention to submit the cartons for re-certification without the corrugated inserts provided they are not required.

Based on the information you provided, this Office can not determine if corrugated inserts are necessary to obtain re-certification of your cartons. Non-bulk Performance-Oriented Packaging Standards are found in Subpart L of Part 178. The testing requirements are found in Subpart M of Part 178.

Based on the information in your letter, it appears that your material can be shipped as a limited quantity. Section 173.150 states that limited quantities of Class 3 (flammable liquids) may be packaged in non-specification combination packagings that conform to the general packaging requirements of subpart B of Part 173 and may not exceed 30 kg gross weight (66 pounds). Flammable liquids in Packing Group II must be packaged in inner packaging not over 1.0 L (0.3 gallon) net capacity each, packed in strong outer containers not to exceed 30 kg gross weight (66 pounds). Flammable liquids in Packing Group III must be packaged in inner packagings not over 5.0 L (1.3 gallons) net capacity each, packed in strong outer packagings not to exceed 30 kg gross weight (66 pounds).

As defined in § 171.8, a strong outer container is the outermost enclosure which provides protection against the unintentional release of its contents under conditions normally incident to transportation.



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173.202

Strong outer containers that are non-specification packagings do not have to be tested in accordance with the performance test requirements specified in Part 178. However, these packagings must conform to the general packaging requirements in § 173.24.

I hope this information is helpful. If we can be of further assistance, do not hesitate to contact us.

Sincerely,



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



June 12, 2002

Foster  
§ 173.202  
Packaging  
02-0180

US Dept of Transportation  
Research and Special Program Admin  
Office of Hazardous Material Safety  
400 7th Street SW  
Washington, D.C. 20590

To Whom It May Concern:

On May 8, 2002, I spoke to Glen and Cameron at the Hazardous Material Information Line, 1-800-467-4922, in regards to requirements and standards for our cartons.

We presently ship Pure Ethyl Alcohols, class 3 flammable liquid in corrugated rectangle cartons. The inner flaps on our pint cartons do not meet and we are using corrugated inserts to cover the open area. My question is, are these inserts a required DOT regulation? Glen and Cameron said "No" and referred me to your organization so I might receive this confirmation in writing

In August, we will be sending our cartons to be re-certified. If this is not a DOT requirement, we would like our cartons to be re-certified without the inserts to save money and labor costs.

I would very much appreciate you contacting me by letter verifying this requirement within thirty days of receipt of this letter. If you cannot get a letter out to me within thirty days, please call me @ 1-800-456-1017 ext. 215 and let me know your thoughts. They follow up with a letter. This will allow us time to make the necessary arrangements.

I appreciate your time in this matter.

Sincerely,

Linda Whitton  
Traffic Manager