



U.S. Department  
of Transportation

**Pipeline and  
Hazardous Materials Safety  
Administration**

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

APR 26 2005

Mr. Paul Lombardo  
VP, Manufacturing  
Brand-Nu Laboratories, Inc.  
377 Research Parkway  
Meriden, Connecticut 06450

Ref. No. 05-0037

Dear Mr. Lombardo:

This responds to your letter dated February 1, 2005, regarding the testing of specification packagings under the Hazardous Materials Regulations (HMR; CFR Parts 171-180). Specifically, you ask whether the one-liter amber glass bottle depicted in a drawing submitted with your letter meets the selective testing criteria in § 178.601(g)(1) and, therefore, would not require further testing of the package.

Provided the new bottle meets all of the pertinent criteria in § 178.601(g)(1) (e.g., similar design and shape, equivalent or smaller size, equivalent level of performance, same or smaller opening, and similarly designed closure), the originally tested design would not be required to be retested. This Office is not capable of making that determination.

I trust this satisfies your inquiry. Please contact us if we can be of further assistance.

Sincerely,

Hattie L. Mitchell  
Chief, Regulatory Review and Reinvention  
Office of Hazardous Materials Standards



050037

178.601(g)(1)

# BNIL

Brand-Nu Laboratories, Inc.

Stevens  
§178.601(g)(2)  
Testing  
05-0037

377 RESEARCH PARKWAY • MERIDEN, CONNECTICUT 06450 • PHONE 800-243-3768 • FAX 203-235-7163 • WEB SITE [www.brandnu.com](http://www.brandnu.com)

February 1, 2005

Mr. Edward Mazzullo

Dir. Office of Hazardous Material Standards

US DOT

RSPA DHM-10

400 7<sup>th</sup> Street SW

Washington, DC 20590-0001

Dear Mr. Mazzullo:

We would like to package a one-liter amber glass bottle in our UN/DOT combination package for four-liter amber glass inner containers without additional testing. We believe this bottle meets all of the criteria in section 178.601.g(1); however we ask that you confirm this opinion.

Enclosed are the drawings for each bottle. The neck size of the tested four-liter bottle is 38-439.

Thank you very much for your assistance. If necessary, I can be reached at 203-235-7989.

Yours truly,



Paul Lombardo

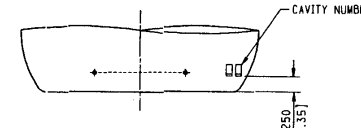
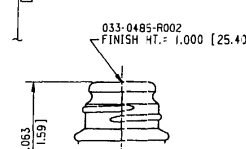
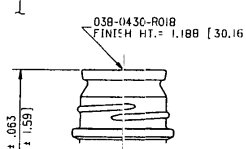
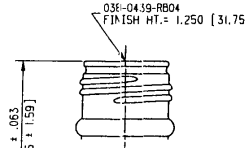
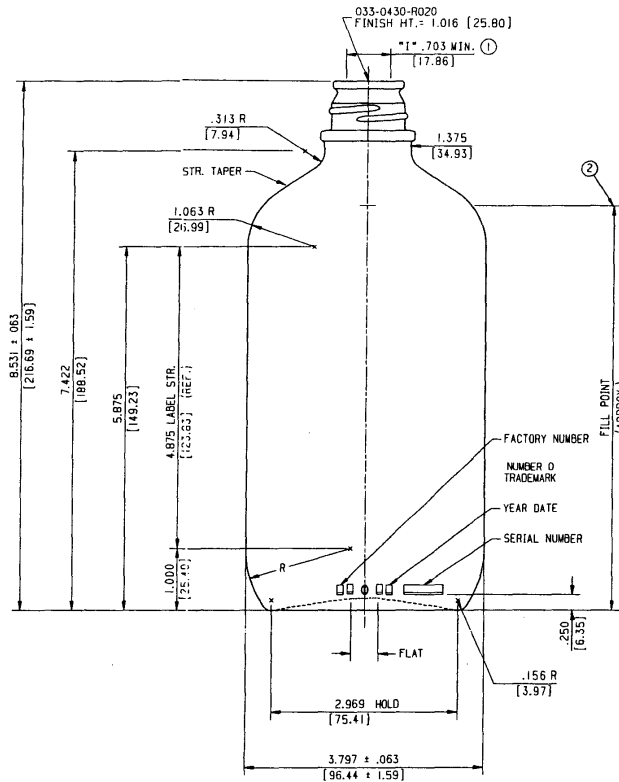
VP, Manufacturing

Enclosures

EMPIRE/EMCO  
4043 MAPLE ROAD  
AMHERST, NY 14226

TENTATIVE PRINT

CAUTION: SPECIFICATIONS ARE TENTATIVE. FINAL GLASS WEIGHT, FILL POINTS AND SIZES TO BE ESTABLISHED FROM ACTUAL PRODUCTION.



① SPECIAL OPENING REQUIREMENTS FOR 033-0430-R020 WARE SHIPPED TO WHEATON SAFETY CONTAINER ONLY. MIN. ".1" OF .703 [17.86] APPLIES THROUGH ENTIRE LENGTH OF FINISH AND NECK. A .770 [19.56] MAX. PLUG GAUGE MAY ENTER, BUT NOT PASS THROUGH OPENING.

② TENTATIVE FILL POINT(S) - APPROXIMATE LOCATION DETERMINED BY CALCULATION. ACTUAL LOCATION TO BE DETERMINED FROM SAMPLING AND/OR FIRST PRODUCTION. FILL LOCATION MAY VARY UP OR DOWN FROM THAT INDICATED.

C.I.D. III DOTS AND CAVITY NUMBER TO APPEAR ON HEEL. CAVITY NUMBER TO BE .188 [4.76] TALL.

HEEL LETTERING TO APPEAR ON SIDE OPPOSITE C.I.D. III DOTS, AND TO BE .156 [3.97] TALL.

OPTIONAL: BOTTOM PLATE LETTERING TO BE .250 [6.35] TALL.

OPTIONAL: C.I.D. RINGS TO APPEAR ON BOTTOM.

BPK-160 TO APPEAR ON BEARING SURFACE.

REPLACEMENT EQUIPMENT BUILT AFTER 07 MAR 01 SHOULD HAVE C.I.D. III DOT PATTERN AND HEEL LETTERING ARRANGEMENT AS SHOWN. PREVIOUS SETS OF EQUIPMENT BUILT BEFORE THIS DATE MAY NOT HAVE THESE FEATURES. MANUFACTURING PLANT MUST VERIFY PRIOR TO OPERATION TO INSURE PROPER C.I.D. EQUIPMENT COMPATIBILITY.

FINISH	OVERFLOW CAPACIT'	WEIGHT
033-0430-R020	35.895 fl. oz. ± .375 [1.07] ± .02 ( 1061.54 ml ± 11.09 ml )	17.000 oz. ± .750 ± .02 ( 481.94 g ± 21.26 g )
038-0439-R004	36.215 fl. oz. ± .375 [1.07] ± .02 ( 1071.01 ml ± 11.09 ml )	17.250 oz. ± .750 ± .02 ( 488.03 g ± 21.26 g )
038-0430-R018	36.075 fl. oz. ± .375 [1.07] ± .02 ( 1066.87 ml ± 11.09 ml )	17.375 oz. ± .750 ± .02 ( 492.57 g ± 21.26 g )
033-0486-R002	35.863 fl. oz. ± .375 [1.07] ± .02 ( 1060.60 ml ± 11.09 ml )	17.000 oz. ± .750 ± .02 ( 481.94 g ± 21.26 g )

REV	DESCRIPTION	DATE	BY
-5	ADDED C.I.D. III DOTS TO HEEL; ADDED OPTIONAL C.I.D. RINGS AND CAVITY NUMBER TO BTM. PLATE; UPDATED NOTES.	08 MAR 01	KJH
-4	ADDED MIN. ".1" DIM. & NOTE	05 NOV 93	KAR
-3	BEARING DIAMETER WAS 2.828	21 SEP 93	JJD
-2	P.L.U. WAS 1.500 R; ADDED EQUIP. NOTE	17 AUG 93	SJF
-1	REV'D CUST. NAME; MOLD NO. & MOLD E WIP. NOTE ADDED	27 JAN 93	KJH

ALL LETTERING TO BE ROUND BOTTOM STYLE  
RAISED IN GLASS, UNLESS OTHERWISE NOTED.  
CAPACITY VALUES BASED ON WATER AT 68°F (20°C)

RATED CAPACITY 33.814 FL. OZ. (1000.00 ml)

OVERFLOW CAPACITY SEE CHART

FILL POINT TENTATIVE

WEIGHT SEE CHART

STOCK 1000 ml

DESCR.(HOUN)

INTL. CAD LIB. DDCM

DATE: 21 APR 93 REF. NO. A-13326

DRAWN: FJR CHECKED: APPROVED: 12 MAR 01

**OWENS-BROCKWAY**  
Glass Container Packaging  
Package Design & Specifications  
One Steeles  
Toledo, Ohio 43665

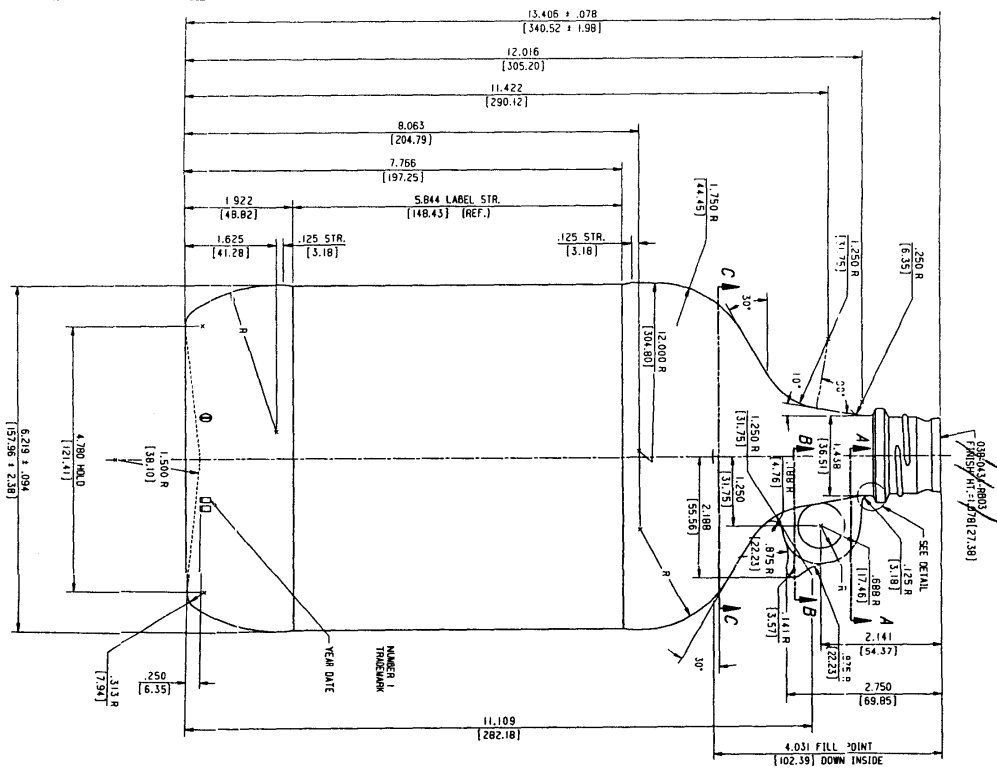
DRAWING NUMBER  
PI-30424-5

MOLD NUMBER  
A-13419

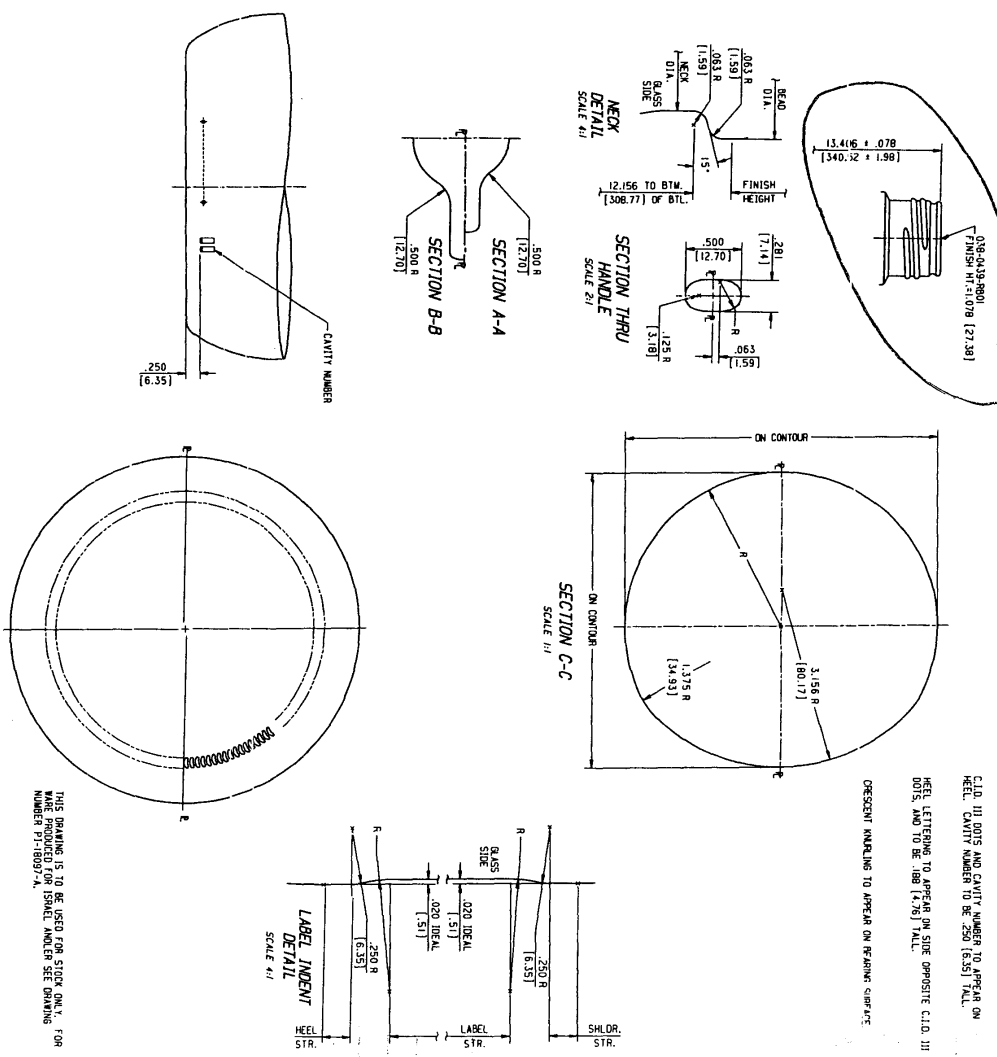
LETT. DIM. UNITS: .001 IN.

Brand Nu Labs

EMPIRE/EMCO  
4043 MAPLE ROAD  
AMHERST, NY 14226



THIS IS BNL FINISH



1	UPDATED NOTES		
2	CAVITY NUMBER WAS ON BOTTOM PLATE. UPDATED NOTES.		
3	HEEL LETTERING WAS ON FRONT VIEW. REMOVED C/P. CHART.		
4	ADDED BACK VIEW. ADDED C.I.D. DOTS. CAVITY NUM. WAS ON FRONT VIEW. REMOVED C/P. CHART.		
5	UPDATED UNDER SPLIT HEAD WAS 20°		

<b>STOCK</b>		<b>4 LITER</b>	
DRUM DIA.	DRUM HGT.	FINISH HT. ±1.078 (27.38)	FINISH HT. ±1.078 (27.38)
41.000 (0.2 ± 0.750 (0.2) (132.24 ± 14.66 (4))			
QUANTITY		4	
DATE		15 OCT 97	
DRAWN BY		D.L. DECK	
CHECKED BY		M.P. P. 27896	
APPROVED BY		A-12891	

CLD 113 DOTS AND CAVITY NUMBER TO APPEAR ON HEEL. CAVITY NUMBER TO BE 250 (6.35) TALL.  
HEEL LETTERING TO APPEAR ON SIDE OPPOSITE CLD 113 DOTS AND TO BE 160 (4.06) TALL.  
DESIGN MARKING TO APPEAR ON REVERSE SURFACE.  
NOTICE: THIS DRAWING IS THE PROPERTY OF EMPIRE/EMCO. IT IS TO BE USED FOR STOCK ONLY. FOR NUMBER POCKETING ON ISRAEL ANDLER SEE DRAWING NUMBER 181899 A.