



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, D.C. 20590

JAN 27 2014

Ms. Cheryl Defelice
Hedwin Corporation
1600 Roland Heights Avenue
Baltimore, MD 21211

Ref. No. 13-0201

Dear Ms. Defelice:

This responds to your October 25, 2013 request for clarification on the periodic retesting requirements for a 4GV non-bulk combination packaging under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, your 4GV non-bulk combination packaging has been selectively tested under Variation 1 specified in § 178.601(g)(1). You seek further clarification on a previously issued letter of interpretation (Ref No 08-0310) as it relates to your packaging.

Your questions are paraphrased and answered as follows:

Q1. Is it necessary to conduct a periodic retest on each closure method that was previously tested during the design qualification test for the 4GV combination packaging?

A1. The answer is no. You may maintain a single test record and report identification number for identical packaging that differ only in method of closure, provided each method of closure is documented in the test report and the packaging successfully passes the required tests when closed in accordance with each closure method identified in the test report. Selective testing of combination packaging under Variation 1 is authorized for 4GV combination packaging in accordance with § 178.601(g)(1).

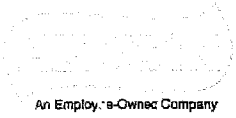
Q2. Is it possible to test just one of the closure methods documented in the report?

A2. The answer is yes. In accordance with Variation 1 in § 178.601(g)(1) selective testing is permitted provided inner closures are of similar design and an equivalent level of performance is maintained.

I hope this answers your inquiry. If you need additional assistance, please call this office at (202) 366-8553.

Sincerely,

Robert Benedict
Chief, Standards Development Branch
Standards and Rulemaking Division



CORPORATION

1600 ROLAND HEIGHTS AVENUE, BALTIMORE, MD 21211

410-467-8209 • FAX 410-467-1761

Boothe
§178.601
Testing
13-0201

May 21, 2012

To Whom It May Concern:

This letter is written to request written clarification of a DOT Interpretation as attached #08-0310. In this letter it was stated that one is not required to have separate packaging test records and separate report identification numbers for combination packagings that are identical except for closure method. Each closure method must be documented and tested.

My question concerns periodic retesting of the test report. Is it necessary to conduct a periodic retest on each closure method once the design report is issued? Or is it possible to test just one of the closure methods documented in the report?

Sincerely,

Susan R. Nauman
Technical Service Supervisor

SRN/cld

Attached: #08-0310



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PHMSA Interpretation #08-0310

Feb 4, 2009

PHMSA Response Letter

February 4, 2009

Mr. John Fosse
Vice-President-Sales
1819 W. Harry Street
Wichita, KS 67213

Ref. No. 08-0310

Dear Mr. Fosse:

This responds to your November 20, 2008 letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if you are required to have separate packaging test records and separate report identification numbers for combination packagings that are identical (i.e., the same inner packagings, the same outer packaging and the same packaging configuration) except for closure method (e.g., one is closed using 2-inch tape while another is closed using glue).

The answer is no. You are required to maintain a record of each design qualification test in accordance with § 178.601(f). The test record must include a description of the packaging design type, including methods of closure. You may maintain a single test record and test report identification number for identical packagings that differ only in method of closure, provided each method of closure is documented in the test report and the packaging successfully passes the required tests when closed in accordance with each closure method identified in the test report.

I hope this information is helpful. Please contact us if you require additional assistance.

Sincerely,

Charles E. Betts
Chief, Standards Development
Office of Hazardous Materials Standards

178.601(1)

DMS ID# 08-0310

[PDF Version](#)

Regulation References:

49 CFR 178.601

More Interpretations on this topic

[Read the Regulation](#)

Can put diff closure in 1 report

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