



U.S. Department  
of Transportation

1200 New Jersey Avenue SE  
Washington, DC 20590

**Pipeline and Hazardous  
Materials Safety  
Administration**

JUL 09 2015

Mr. Jason Sherrier  
Laboratory Manager  
SGS North America, Inc.  
291 Fairfield Ave  
Fairfield, NJ 07004

Reference No. 15-0074

Dear Mr. Sherrier:

This is in response to your April 13, 2015 e-mail request regarding requirements under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the use of aluminum boxes. You note that you intend to offer a non-explosive PG III solid material in a 4B aluminum box. Specifically, you ask if a 4B aluminum box can be certified without a liner being present.

The answer to your question is yes. In accordance with § 178.512(b) as a part of their general design standards, aluminum boxes must be lined with fiberboard or felt packing pieces or must have an inner liner or coating of suitable material in accordance with subpart C of part 173 of this subchapter. The intent of the reference to subpart C of part 173 of the HMR is to ensure that these lining or coating requirements are applicable only to boxes intended to transport explosives. In your incoming email you reference a 52 FR 67403 rulemaking. There is no such *Federal Register* citation. Section 178.512 was amended by HM-215A (59 FR 67521) in December of 1994. The text provided in the preamble for proposed changes to § 178.512 in the HM-215A NPRM (59 FR 36498) states

“Standards for steel and aluminum boxes would be consolidated by removing the distinction between unlined/uncoated steel or aluminum boxes and steel or aluminum boxes having an inner liner or coating. Therefore, both unlined and lined steel boxes would be identified as 4A and unlined and lined aluminum boxes would be identified as 4B. Corresponding revisions would be reflected in the packaging authorizations of Part 173.”

Existing non-bulk packaging authorizations (e.g. § 173.212) for certain hazardous materials will show single packaging authorizations for both “Aluminum box: 4B” and “Aluminum box with liner: 4B”. If the non-bulk packaging requirements section referenced in column 8A for the material in question indicates an “Aluminum box: 4B” is an authorized single packaging the material may be offered in an aluminum box without a coating or liner.

I trust this information is helpful. If you have further questions, please do not hesitate to contact this office.

Sincerely,

A handwritten signature in black ink that reads "Duane A. Pfund". The signature is written in a cursive style with a large, prominent initial "D".

Duane Pfund  
International Standards Coordinator  
Standards and Rulemaking Division

**Goodall, Shante CTR (PHMSA)**

Weldo  
178.512(b)(2)  
Packaging Specification  
15-0074

**From:** Geller, Shelby CTR (PHMSA)  
**Sent:** Monday, April 13, 2015 1:55 PM  
**To:** Hazmat Interps  
**Subject:** FW: Formal Interpretation Request  
**Attachments:** 4B liner interp.pdf

Good Afternoon Shante and Alice,

Attached is a formal letter of interpretation. Please let me know if you need anything else.

Thanks,  
Shelby Geller

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**From:** Sherrier, Jason (Fairfield) [<mailto:Jason.Sherrier@sgs.com>]  
**Sent:** Monday, April 13, 2015 10:29 AM  
**To:** INFOCNTR (PHMSA)  
**Subject:** Formal Interpretation Request

Good Morning,

Please find my attached formal interpretation request and advise if anything else is needed. Thank you in advance.

**Jason Sherrier**  
**Consumer Testing Services**  
Lab Manager, Packaging & Building Materials

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April 13<sup>th</sup>, 2015

Attn: Info Center

The purpose of this letter is to request a formal interpretation of §178.512(b)(2) of the 49 CFR to determine if a liner is necessary for all metal boxes with reference to Rule 52 FR 67403.

The container in question is a five sided canister type 4B aluminum box with a removable top and bottom plates (with gaskets) that is intended to transport a solid PG III, filter material. The intended PG III material is non explosive and a liner and or coating on the inside of the container described in §178.512(b)(2) interferes with the end use of this product. No welds are present on this design so ingress of the material into any seam is not possible. The box was tested to a PG III and performed very well against the requirements for drop, vibration and stacking.

When an informal question was asked to Transportation Specialist Michael Nicks, he directed me to Rule 52 FR 67403 which references "unlined and lined" aluminum boxes are identified as 4B however suggested I request a formal interpretation.

To simplify my question, Can we certify this 4B aluminum box without a liner being present?

Thank you in advance.

SIGNED FOR AND ON BEHALF OF  
SGS North America, Inc.

Jason Sherrier  
Laboratory Manager  
CA2006080033 (+BA)

applicable SGS conditions of service available on request and accessible at <http://www.sgs.com/en/Terms-and-Conditions.aspx>