



U.S. Department of Transportation  
**Pipeline and Hazardous Materials  
Safety Administration**

1200 New Jersey Ave, S.E.  
Washington, D.C. 20590

MAY 20 2009

Ms. LaDonna Anthony  
All Star Corrugated  
1425 Forum Way So.  
Fort Worth, TX 76140

Ref. No. 09-0059

Dear Ms. Anthony:

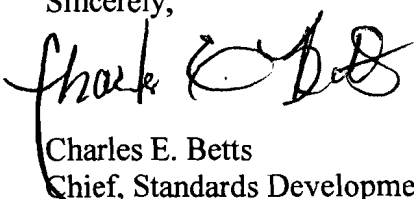
This responds to your March 3, 2009 request for clarification of package certification requirements under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if your company may use the current certification from another box manufacturer as long as you follow the current specifications.

According to your letter, your company is going to manufacture UN 4G boxes utilizing a design that has been tested and certified by a different manufacturer. It is your understanding that your company may use the other box manufacturer's certification for the boxes you manufacture provided the boxes conform to the design specifications as certified by the original manufacturer.

You may use the test report for the package, but must mark the box with your name or symbol identifying you as the manufacturer of the box. In order to continue using the third-party lab mark, you must either receive authorization from the third-party certifying the package or submit the package for testing with the original third-party lab.

I hope this answers your inquiry.

Sincerely,



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

960770

Boothe  
8178.516  
Standards for fiber board Boxes  
09-0059

**Drakeford, Carolyn <PHMSA>**

**From:** Boothe, Deborah <PHMSA>  
**Sent:** Tuesday, March 17, 2009 9:12 AM  
**To:** LaDonna Anthony  
**Cc:** Boothe, Deborah <PHMSA>; Drakeford, Carolyn <PHMSA>  
**Subject:** RE: UN/IMDG Box Certifications  
**Importance:** High

Hi LaDonna,

Thank you for the information! It's very helpful! It would also be helpful if you could be more specific regarding the type of explosive devices, e.g. UN number, proper shipping name, etc., that will be packaged in these packages.

Thank you again! Hope you're having a great day!

Deborah Boothe  
DOT/PHMSA/Office of Hazardous Materials Standards/PHH-10  
202-366-8553

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**From:** LaDonna Anthony [mailto:ladonna.anthony@sbcglobal.net]  
**Sent:** Friday, March 13, 2009 4:37 PM  
**To:** Boothe, Deborah <PHMSA>  
**Subject:** RE: UN/IMDG Box Certifications

Hello Deborah,

We would like to manufacture shipping boxes for a company that makes shape charges for the oil field industry. They are explosive devices for underground drilling. We made their boxes for years and then lost the business to a competitor. Now we are getting some of it back. Some of the boxes are in the "middle" of a certification. That is, there are several months left until re-certification is required. I have been told that we can use the current certs from the other box manufacturer as long as we follow the specs, which of course we would. I need a letter from you stating that it is allowed. The boxes are RSC, 275# Double Wall with Michelman coating. An example of the cert. would be UN 4G/Y3/S/2009  
USA/+AQ1493

Let me know if you need more info.  
Thanks for your help!  
LaDonna

*LaDonna Anthony*  
*All Star Corrugated*  
*817-454-8665*  
*ladonna@allstarbox.com*

--- On Wed, 3/11/09, [deborah.boothe@dot.gov](mailto:deborah.boothe@dot.gov) <[deborah.boothe@dot.gov](mailto:deborah.boothe@dot.gov)> wrote:

| **From:** [deborah.boothe@dot.gov](mailto:deborah.boothe@dot.gov) <[deborah.boothe@dot.gov](mailto:deborah.boothe@dot.gov)>  
| **Subject:** RE: UN/IMDG Box Certifications  
| **To:** [ladonna.anthony@sbcglobal.net](mailto:ladonna.anthony@sbcglobal.net)  
| **Cc:** [carolyn.drakeford@dot.gov](mailto:carolyn.drakeford@dot.gov), [deborah.boothe@dot.gov](mailto:deborah.boothe@dot.gov)

3/17/2009

Date: Wednesday, March 11, 2009, 2:01 PM

Good afternoon,

I have been assigned to prepare your letter of interpretation re: UN/IMDG certifications. I will need more specific information in order to prepare your letter. Will you please provide me with additional information, such as, type of package, package spec, type of explosive devices shipped in these packages, weight shipped, more specific information on the current certification for All Star Corrugated, etc.

Thank you.

Deborah Boothe  
Transportation Regulations Specialist  
DOT/PHMSA/Office of HazMat Standards/PHH-10  
202-366-8553

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**From:** Drakeford, Carolyn <PHMSA>  
**Sent:** Wednesday, March 11, 2009 2:46 PM  
**To:** Boothe, Deborah <PHMSA>  
**Subject:** FW: UN/IMDG Box Certifications

fyi

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**From:** INFOCNTR <PHMSA>  
**Sent:** Wednesday, March 04, 2009 8:26 AM  
**To:** Drakeford, Carolyn <PHMSA>  
**Subject:** FW: UN/IMDG Box Certifications

Carolyn,  
A request for a written interpretation. See below.  
Thanks,  
Rob

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**From:** LaDonna Anthony [mailto:[ladonna.anthony@sbcglobal.net](mailto:ladonna.anthony@sbcglobal.net)]  
**Sent:** Tuesday, March 03, 2009 2:46 PM  
**To:** INFOCNTR <PHMSA>  
**Subject:** Fw: UN/IMDG Box Certifications

*LaDonna Anthony  
All Star Corrugated  
817-454-8665  
[ladonna@allstarbox.com](mailto:ladonna@allstarbox.com)*

--- On Tue, 3/3/09, LaDonna Anthony <[ladonna.anthony@sbcglobal.net](mailto:ladonna.anthony@sbcglobal.net)> wrote:  
From: LaDonna Anthony <[ladonna.anthony@sbcglobal.net](mailto:ladonna.anthony@sbcglobal.net)>  
Subject: UN/IMDG Box Certifications  
To: [infocnter@dot.gov](mailto:infocnter@dot.gov)  
Date: Tuesday, March 3, 2009, 7:44 PM

Dear Sirs,  
Thank you in advance for your help on this matter.

3/17/2009

We are requesting a written letter of interpretation regarding the use of UN/IMDG certifications. All Star Corrugated is a manufacturer of corrugated shipping boxes. We currently produce many certified boxes for various explosive device manufacturers. We are in pursuit to re-gain the business of a past customer and provide them with boxes. We need to assure them that we can use their current certification. Of course, we know to follow exactly the specifications that are outlined in the certification. Please let me know if there is anything else you need from me.

You can mail the letter of interpretation to:

All Star Corrugated  
1425 Forum Way So.  
Fort Worth . TX 76140

Attn: LaDonna Anthony

*LaDonna Anthony*  
*All Star Corrugated*  
*817-454-8665*  
*ladonna@allstarbox.com*