



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

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

DEC 4 2002

Mr. Peter El-Sabaaly
Director of Engineering
Alloy Products Corporation
P.O. Box 529
Waukesha, WI 53187-0529

Ref. No. 02-0221

Dear Mr. El-Sabaaly:

This responds to your August 16, 2002 letter requesting clarification on package testing requirements under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if the vibration standard under § 178.608 is required for the design qualification testing only and not the periodic retesting of packagings.

Your understanding of vibration standard is that the vibration test is required for the design qualification testing only and does not apply to the periodic retesting. Your understanding is incorrect. All performance tests for design qualification testing and periodic retesting under §§ 178.603, 178.604, 178.605, 178.606, or 178.607, must be performed in accordance with provisions in § 178.601(c)(1) and (c)(2) at the frequency specified in 178.601(e). These performance tests are required to be performed and packages must successfully pass these tests before they can be certified as a UN performance packaging authorized to carry hazardous materials.

However, as specified in § 178.608, each non-bulk packaging must be capable of withstanding, without rupture or leakage, the vibration test procedure outlined in this section. This capability can be demonstrated through the packaging performance history using this type of packaging or by performing the vibration test. The vibration test is not required to be performed for non-bulk packagings. For certain bulk packagings, such as intermediate bulk containers, the vibration test must be conducted for both design qualification and periodic retesting.

I hope this answers your inquiry.

Sincerely,

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



020221

178.601

ALLOY PRODUCTS CORP.
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Boothe
§178.601
Testing
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Friday, August 16, 2002

Department of Transportation
Office of Hazardous Material and Technology
400 7th Street Southwest
Room # 8430
Washington, D.C., District of Columbia

Reference : Bureau of Explosives, Tariff # BOE-6000

Attention : Mr. Thomas G. Allen

Dear Mr. Allen

During the design qualification testing per Subpart M , we perform all test required in section 178.601,c,1. In addition , we perform the vibration test as per section 176.608.

Question :

During periodic testing per section 178.601,c,2 , are we required to perform the vibration test as well ?

My interpretation is that the vibration test is required for the design qualification testing only and it does not apply to the periodic testing. Am I correct?

I am looking forward for your response. Thank you

Regards,

Peter El-Sabaaly

Peter El-Sabaaly
Director of Engineering

DOTvibration.peter