



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

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

JUN 6 2006

Mr. Michael Bowen
Vice President
DG Supplies, Inc.
239 Prospect Plains Road
Monroe Township, NJ 08831

Ref. No. 06-0080

Dear Mr. Bowen:

This is in response to your March 22, 2006 letter requesting clarification of the general packaging requirements specified in the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Your company designs and tests fiberboard packagings intended to contain liquids and solids for air, ground and ocean shipments. You describe a particular combination packaging design for liquids, which utilizes molded-pulp inserts to secure glass bottles ranging from 0.5 – 4.0 liters within an outer fiberboard box (with no absorbent). You ask us to assume the completed package satisfies all necessary testing specified in Part 178. You also state the molded-pulp inserts could break down in composition if one of the bottles was to leak its contents. Specifically, you ask if the packaging you described satisfies the general securing and cushioning requirement in § 173.24a(a)(3) for non-bulk packagings and packages.

Unless otherwise excepted by the HMR, non-bulk packagings and packages intended to contain hazardous materials must satisfy the general packaging requirements in § 173.24a. Under section § 173.24a(a)(3), cushioning material for non-bulk packagings or packages must not have its protective properties significantly weakened in the event of leakage. The packaging you describe does not satisfy the requirement because a breakdown in composition of the molded-pulp inserts could significantly weaken the protective properties of the cushioning material.

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

Sincerely,

John Gale
Chief, Standards Development
Office of Hazardous Materials Standards



060080

173.24a(a)(3)
178.602



Eichenlaub
§ 173.24a
§ 178.602
Testing
06-0080

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US Department of Transportation
Attention: Mr. Ed Mazzullo
Research and Special Programs Administration
Office of Hazardous Materials Standards
400 Seventh Street S.W.
Washington, DC 20590

March 22, 2006

Dear Mr. Mazzullo,

We have been asked by multiple customers to design and test fiberboard package(s) intended to contain liquids and solids for air, ground and ocean shipments. The package would utilize molded-pulp inserts to secure glass bottles ranging from 4 liters down to .5 liters within the outer fiberboard box (with no-absorbent). Assuming the completed package passes all necessary testing outlined in Part 178 could the package still not be authorized for use because of §173.24a (A)(3) in where the molded-pulp inserts could break down in composition if one of the bottles was to leak its contents?

I value your time and appreciate your response.

Sincerely,

Michael Bowen
Vice President

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