



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

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

FEB 27 2013

Mr. J.D. Thomas
Dyno Nobel Inc.
Simsbury Plant
660 Hopmeadow Street
Simsbury, CT 06070

Reference No. 12-0216

Dear Mr. Thomas:

This is in response to your e-mail requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR 171-180) applicable to the packaging for transportation of non-electric detonators. In your letter, you state that the detonators are packaged in a 4G fiberboard "outer" box in a manner that protects and prevents movement of the articles. You also state that the detonator assemblies have a shock tube that is wound in a loop or figure 8 configuration and that they have voids between the coils due to the coils overlapping each other. You ask whether a 4G fiberboard box used as a single packaging for non-bulk materials is a receptacle and whether it would be considered a one-time use receptacle. You also present your concern regarding the requirement to fill the box to 95% when testing.

The 4G fiberboard box is not a receptacle in the context of § 178.602. Your package is a combination package with the articles being the inner packages and the 4G fiberboard box being the outer package. The 95% fill requirement does not apply to articles and, therefore, the testing should take place with the 4G fiberboard box filled as it would be prepared for transportation or as otherwise specified in § 173.602. You must also determine whether additional cushioning, et cetera, should be included in the package and otherwise ensure conformance with §§ 173.24 and 173.24a for general requirements for non-bulk packagings and packages.

With respect to reuse, to reuse a packaging, you must ensure that it conforms to § 173.28, which in part requires that packagings and receptacles used more than once must be in such condition, including closure devices and cushioning materials, that they conform in all respects to the prescribed requirements of the HMR. If your packaging does not conform to

Drakeford, Carolyn (PHMSA)

McIntyre
8171.8
Definitions

From: Eckenrode, Andrew.CTR (PHMSA) on behalf of INFOCNTR (PHMSA)
Sent: Wednesday, September 26, 2012 2:32 PM
To: Drakeford, Carolyn (PHMSA)
Subject: FW: interpretation
Attachments: pic19629.jpg

12-02/16

Carolyn,

We received the following request for a formal letter of interpretation

Thanks
Andrew

-----Original Message-----

From: jd.thomas@am.dynonobel.com [mailto:jd.thomas@am.dynonobel.com]
Sent: Monday, September 24, 2012 1:50 PM
To: INFOCNTR (PHMSA)
Subject: interpretation

Dear Hazardous Material Information Center:

Is a 4G fiberboard box used as outer packaging in non-bulk packaging in a single packaging configuration (meaning it does not have any inner packaging) considered a receptacle? Would it be also considered a one time use receptacle?

I package non-electric detonators in a 4G fiberboard outer box that are packaged in such a way that the fit prevents freedom of movement and protects the articles from sources of impact. The detonator assemblies have shock tube that is wound in a loop or figure 8 configuration. When these articles are packed in the box they are snug and once the box is full, we can not put more units in the box. The units do have voids between the coils as the coils overlap each other.

A DOT inspector for our UN POP test facility states that the detonator assemblies do not fill the box to 95% of its volume (required for a receptacle) because of these small voids. This inspector believes that the outer box is a receptacle and/or a one time use receptacle and therefore can not be used for my articles and can only be tested as a receptacle at 95% capacity (which has the definition of volume) . We can not put in another unit, it would burst the box.

Again - is a single packaging 4G fiberboard box used for non-bulk materials a receptacle?

(Embedded image moved to file: pic19629.jpg)

You can see the voids where coils of shock tube complete their figure 8 pattern. The units do not compress and fill the box to a good snug fit.

Best regards,
J.D. Thomas
Global Product Management Support / Integration + Packaging + Change Management

Dyno Nobel Inc.

A business of Incitec Pivot Limited

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