



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

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

JUN 25 2010

Mr. Bob Korman
President
Roadrunner Rocketry, Inc.
116 Cascade Way
Coppell, TX 75019

Ref. No. 09-0088

Dear Mr. Korman:

This responds to your letter requesting clarification of the preparation requirements for testing non-bulk combination packaging and package designs under Subpart M of Part 178 of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask whether a combination packaging design (e.g., UN 4G), originally tested with inner packagings containing liquids, may be used to package solid materials without further testing. I apologize for the delay in responding to your letter and any inconvenience it may have caused.

The HMR, at § 178.602, require each packaging and package to be closed in preparation for testing and tests to be carried out in the same manner as if prepared for transportation, including inner packagings in the case of combination packagings. Therefore, a combination packaging design originally tested with inner packagings containing liquids may not be used to package solid materials, as a single package or otherwise, without further testing.

I trust this satisfies your inquiry. Please contact us if we can be of further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read 'H. Mitchell', written over a horizontal line.

Hattie L. Mitchell
Chief, Regulatory Review and Reinvention
Office of Hazardous Materials Standards

Road
Runner
Rocketry, Inc.

Stevens
\$ 173.56
Explosive
09-0088

116 Cascade Way Coppell, TX 75019, 972-462-9220
Fax 1-866-280-6582
www.RoadrunnerRocketry.com

April 8, 2009

Office of Hazardous Materials Standards
Pipeline and Hazardous Materials Safety Administration
U.S. Department of Transportation
East Building
1200 New Jersey Ave, SE
Washington, DC 20590-0001

Attention: PHH-10

Sent via email to infocntr@DOT.gov

Dear sirs:

Roadrunner Rocketry, Inc. is writing to determine if a particular UN4G rated package is acceptable for shipping certain hazardous solids.

Background

Uline Corporation sells a line of UN4G boxes designed primarily for shipping liquids in gallon and quart containers. They can be seen online at www.uline.com/BL_5304/Hazardous-Materials-Box-Shippers.

The boxes have a packaging code of Y, indicating their acceptability for Packing Group II and III materials. They are also marked S, indicating they are certified for use as combination packaging, or for single packaging intended to contain solids.

However, a flap on the Uline boxes indicate that the box is "UN4G compliant only when all parts of combination package are used and assembled properly." Another flap lists those components: gallon (or quart) cans, locking rings, and foam inserts – components obviously used for shipping liquids.

Roadrunner ships model rocket motors classified as 1.4C or 1.4S explosives, Packing Group II, instruction 134. These model rocket motors are solids and are packaged in inner packages as specified in instruction 134.

Question

Can Roadrunner use these Uline boxes as outer packaging to ship its solid products (in appropriate inner packaging as specified in instruction 134) without using the components specified on the flap of the boxes (cans, locking rings and foam inserts)?

Another way of stating this is to ask whether it is correct to say that the statement on the box that it is "UN4G compliant only when all parts of the combination package are used..." is only applicable to shipping liquids and that the box is compliant for shipping appropriate solids without the indicated components.

I appreciate your prompt attention to this request as Roadrunner will shortly need to purchase additional UN4G packaging.

Should you need clarification or additional information in order to answer my questions, please call me at 972-462-9220. Thank you.

Sincerely,

Bob Korman
President
Roadrunner Rocketry, Inc.