



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

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

OCT 20 2009

Mr. Christian Prickett
All-Pak Inc.
Corporate One West
1195 Washington Pike
Bridgeville, PA 15017

Ref. No.: 09-0191

Dear Mr. Prickett:

This responds to your letter of August 19, 2009, regarding testing of specification packagings under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if your company may use another manufacturer's cap in place of the cap currently being used on the inner packagings of a combination packaging intended for the transportation of liquid hazardous materials.

According to your letter, your company uses combination packagings consisting of four one-gallon plastic inner packagings placed inside of a UN 4G fiberboard box. The inner packagings were tested with a Van Blarcom 7.7 gram 38-CRC cap. You ask if you may substitute an alternative cap manufactured under the same process as the Van Blarcom cap – a Mold rite 38-CRC cap.

The answer is yes. Section 178.601(g) of the HMR provides a series of conditions for the selective testing of packagings that differ in only minor respects from a tested design-type (see §178.601(g)(1)(i)(A)-(F)). In accordance with § 178.601(g)(1)(i)(C), you may vary the closures on inner packagings of a tested combination packaging without further testing of the package provided the inner packagings have the same or smaller openings as the tested design and the closure is of similar design as the tested design. The information provided with your letter indicates that the cap you wish to use is of the same design type as the cap used in the tested design; therefore you may substitute the Mold rite cap for the Van Blarcom cap.

I hope this information is helpful. If we can be of further assistance, please contact us.

Sincerely,

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

Engram
3178.601
Testing
09-0191

Drakeford, Carolyn (PHMSA)

From: INFOCNTR (PHMSA)
Sent: Wednesday, August 19, 2009 3:31 PM
To: Drakeford, Carolyn (PHMSA)
Subject: FW: interpretation for 178.601
Attachments: BR 6425.pdf; CRC38 (Assembled).pdf

From: Prickett, Christian T. [mailto:prickettc@all-pak.com]
Sent: Wednesday, August 19, 2009 1:24 PM
To: INFOCNTR (PHMSA)
Subject: interpretation for 178.601

Mr. Edward Mazzullo,

We have a 1 gallon UN rated 4 pack tested with a Van Blarkum 7.7 gram 38-CRC cap. We have an alternative cap manufactured under the same process (injection molded unscrewing mold) that with the liner is about 7.8 to 8 grams (using the same thickness and type of lining material). I'd like to know, may I use the Mold rite 38-CRC with F217 liner as an UN approved substation under the interpretation for 178.601 for substation in place of the Van Blarkum cap?

I've found only one document on your website that discussed this but it talks about caps made of a different process and doesn't talk about matching specs at all.

<http://www.phmsa.dot.gov/staticfiles/PHMSA/DownloadableFiles/Files/Interpretation%20Files/2002/020126.pdf>

Information on the Mold Rite 38-CRC cap we are using can be found on the following link...

<http://www.mrpcap.com/info/documents/CRC38Protocol.pdf>

The drawing of the cap is the PDF file CRC38 pdf attached.

Please call me with any questions.

Thank you,

Christian Prickett

All-Pak Inc.
Corporate One West
1195 Washington Pike
Bridgeville, PA 15017

Phone: (412) 257-3000
Fax: (412) 257-3001
Cell: (724)344-0719

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8/19/2009