



U.S. Department  
of Transportation

**Research and  
Special Programs  
Administration**

MAR 22 1999

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

Ms. Sue E. Pelletier-Bruno  
Package Research Laboratories  
41 Pine Street  
Rockaway, NJ 07866

Ref. No: 99-0005

Dear Ms. Pelletier-Bruno:

This responds to your letter of February 17, 1999, and your conversation with Ms. Diane LaValle of this office concerning requirements for testing specification packagings under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask for confirmation that testing is not considered complete until a test report has been prepared, dated, and signed.

Your understanding is correct. A test report must be completed for each packaging design qualification test and each periodic retest. Section 178.601(l) of the HMR sets forth the information that must be included in each test report. The test report may not be signed and dated until all the required information is compiled and finalized. Completion of a test report is the final step in the packaging design qualification testing or periodic retesting process; thus, no specification packaging may be manufactured for sale or use until a report documenting successful completion of all required tests has been completed.

I hope this information is helpful. If you have further questions, please do not hesitate to contact this office.

Sincerely,

Thomas G. Allan  
Senior Transportation Regulations Specialist  
Office of Hazardous Materials Standards

178.601



PACKAGE RESEARCH LABORATORY Division of Stapling Machines Co., LLC  
41 Pine Street, Rockaway, New Jersey 07866

44-0005  
8778-601 Gorsky  
(orig)

February 17, 1999

Ms. Diane LaValle  
US Dept. of Transportation  
400 7th Street South West  
RSTA-DHM-10  
Room 8102  
Washington DC, 20590

Dear Diane:

Thank you for taking the time to review our question today. The head of our lab has requested that we get the answer in writing. I appreciate your time and have repeated the situation below:

We tested combination packages of Corrugated Fibreboard containers and plastic or glass bottles under the provisions of Title 49, Code of Federal Regulations, Section 107.404 (49CFR). The physical tests were completed in December, however the suppliers of their plastic and glass were not able to get the specifications to us until February. Therefore, the cartons were held up awaiting the completion of the gathering of specifications and approval certificate.

As per our conversation on February 17, 1999 you indicated that the tests were not complete until the specifications were compiled and we should put that date on the test date area of the report. I want to clarify that the customer has not been able to manufacture cartons while awaiting the completed reports.

Thank you for your prompt attention and we look forward to receiving your response.

Sincerely,

Sue E. Pelletier-Bruno  
Package Research Laboratories