



U.S. Department
of Transportation
**Research and
Special Programs
Administration**

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

JUL 2 2001

Mr. William Eaton
Packaging Development Engineer
Cadbury Schweppes
30 Trefoil Drive
Trumbull, CT 06611

Reference No. 00-0269

Dear Mr. Eaton:

This is in response to your letter and conversations with a member of my staff asking if 13 different non-bulk combination packages your company is using may be marked with their own specification to indicate the heaviest weight and most severe packing group.

You stated the packages consist of using the same outer fiberboard box and various inner bottles made of polyethylene terephthalate or high density polyethylene up to 1-gallon in size filled with a Class 3 (flammable), PG II, or Class 8 (corrosive), PG III, material. You also stated that, although the packaging configurations meet the conditions prescribed in Variation 1 of § 178.601(g)(1), your company tested each packaging configuration and that each passed the UN performance tests.

Based on the information contained in your letter, the answer is yes. Each tested package may be marked once to denote the most stringent tested packing group performance level and maximum gross mass. For future reference, all tested configurations may be included on a single test report.

I hope this satisfies your request.

Sincerely,

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



00-0269

178.601

Cadbury Schweppes



Edmonson

178.601



GLOBAL BEVERAGES
TECHNOLOGY CENTER

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Markings
Testing Packagings
00-0269

September 14, 2000

Mr. Edward T. Mazzullo
Director, Office of Hazardous Materials Standards
U.S. DOT/RSPA (DHM-10)
400 7th Street S.W.
Washington, D.C. 20590-001

Dear Mr. Mazzullo:

I am writing to request confidential interpretation and confirmation of proper marking for a specific set of circumstances related to class 3, packing group II, combination packaging.

We have a series of UN Standard combination packaging (Kits) using the same outer corrugated package and various inner packaging containing Class 3 PG II hazardous products. All have been tested in their actual shipping configuration and passed the required tests. Below are pack configurations that cover the various inner packs at the highest usage level. (P# indicates part number) In some cases, not all of the inner packages contain hazardous materials, however we treat each as such for test purposes to determine the performance of the actual finished shipping unit.

PET- Polyethylene Terephthalate

HDPE- High Density Polyethylene

1. P1-2x1gal PET+P2-2x0.5gal PET+P3-2x4oz HDPE
2. P1-2x1gal PET + P-2 2x32oz PET
3. P1-2x1gal PET+P2-2x0.5gal PET+P3-2x32oz PET (Covers #1 & #2, but tested others for assurance purposes)
4. P1-2x1 gal PET + P2-1x5L HDPE
5. P1-1x1gal HDPE + P2-3x2.0L HDPE
6. P1-4x3.0L HDPE + P2-4x8oz HDPE
7. P1-4x1gal HDPE + P2-4x4oz HDPE +4x60gm bag non haz powder
8. 4x1gal HDPE + 4x 0.81 # bags non haz powder
9. 2x1gal PET + 1x8.5#+1x4.49#+2x10.36# bags non haz powder
10. P1-2x1gal PET + P2- 2x16oz PET + 2x2.82#+2x2.0#+2x1.7# bags non haz powder
11. P1-1x.5gal PET+P2-1x1galPET+5.36#+ 2.83#+ 13.08# bags non haz powder
12. 4x1 gal PET
13. P1-1x32oz PET + P2-1x32oz PET+ P3-3x1gal PET

In some cases, we include non-hazardous bagged dry ingredients, which are non-reactive and help fill any voids to keep the unit tight and stable. Also several of the inner packages could fall under the variation 1 provisions, however we have choose to test each for assurance of performance.



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A MEMBER OF THE CADBURY SCHWEPES plc GROUP

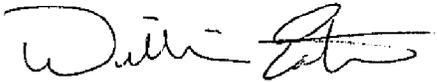
I am interpreting the DOT regulations for marking as follows. Within the UN marking is the maximum weight tested for that outer package. For all of the above noted tests, the UN Marking would be the same with the exception of the weight tested. We are proposing to use a single marking that indicates the heaviest tested package weight. Having an individual UN marking for each pack tested would serve no purpose to my knowledge and should not be required if the level of testing covers the most severe packing group. We also include on the bottom flap reference to each UN test report number to allow easy and quick access to necessary details of tested components.

The reason for approaching this issue in this manner is that we have 13 different test packs for the single outer package and using individual UN markings for each would take up an entire side of the box. This space is necessary for product, hazard and instructional labeling for proper handling and storage. I have spoken to Diane Levalle at the Hazmat Service Center as well as other contacts. Most are in agreement with my interpretation, however our supplier is not in agreement as they have received responses from local enforcement agents indicating a UN marking for each test pack needs to appear on the box. This would equate to having up to 13 UN markings with essentially the same information in each line with the exception of the weight of the tested package.

Due to business needs to continue production, we are proceeding to mark the outer shipper with a single marking for PG II, using the highest weight tested and our M number issued to us from the DOT. Please confirm if this approach is appropriate. If this is not the correct means of marking based on the above situation, please provide details on properly marking our shippers for the above circumstances.

Thank you in advance for your response.

Sincerely,



William Eaton
Packaging Development Engineer

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Cc:
Eric Crouch
Denise Lefebvre
Jack Neill
Gene Mett
Karen O'Toole
Kathy Stohldrier