



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

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

AUG 2 2002

Mr. Richard M. Thomas  
Packaging Performance Specialist  
Smurfit-Stone Container Corporation  
910 Pasquinelli Drive  
Westmont, Illinois 60559-5526

Ref. No. 02-0035

Dear Mr. Thomas:

This responds to your January 29, 2002 letter requesting clarification on package testing under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if your box plant can be required to sign a blanket statement guaranteeing that fiberboard used in the outer packaging will always "pass" the 30-minute Cobb Water Absorbency Test. You also ask what must pass the Cobb Test, the "combined" (corrugated fiberboard material) or the "base material" (outer liner component only), and, what results to use, an individual result or average of test results as indicated in the ISO International Standard 535 provisions?

According to your letter, 3<sup>rd</sup> party and/or self-certified labs are requesting that your box plants sign blanket statements guaranteeing the fiberboard that is used in their outer packaging always "pass" the 30-minute Cobb Test. You believe that this type of practice is unacceptable since each run of corrugated board may provide different results. The HMR do not require blanket statements guaranteeing that the fiberboard will always pass the Cobb Test. Decisions regarding such business practices should be negotiated between your company and your customers.

In your package testing scenario, the Cobb Test is conducted on the "combined" (corrugated fiberboard material) and it fails to pass the Cobb Test. If the Cobb Test was then conducted on the actual "base materials" (outer liner component only) that was actually used in the box and the base material passes, you ask which set of results should you use. Section 178.516(b)(1) requires the outer surface of the combined board to be tested, not the "base materials" or outer liner component. ISO International Standard 535 specifies using the average, therefore, the average test results determine whether the fiberboard passes or fails the Cobb Test.

I hope this answers your inquiry.

Sincerely,

Delmer F. Billings  
Chief, Standards Development  
Office of Hazardous Materials Standards



02-0035

178.516


**Smurfit-Stone**  
 Marketing and Technical Center

January 29, 2002

Mr. Delmer Billings  
 US-DOT  
 Research and Special Programs Administration  
 Office of Hazardous Materials Standards, DHM-10  
 400 7th St, SW  
 Washington, DC 20590

Dear Mr. Billings:

After thoroughly reviewing the responses (Ref. No. 00-0342 and 00-0342a) from our last Letter of Interpretation dated December 6, 2000, we have realized that one of our questions were not answered:

**Request 4: Standards for Fiberboard Boxes (49 CFR 178.516)**

Can a 3rd-Party and/or Self-Certified Lab require any of our Box Plants to sign Blanket Statements guaranteeing the fiberboard that is used in their outer packaging to always "Pass" the 30-min. Cobb Water Absorbency Test? We believe this type of practice is unacceptable since each run of corrugated board may provide different results.

**New Questions**

During several recent conversations with Mr. Don Burger from your office on the topic of the 30-min. Cobb Water Absorbency Test, we are requesting a clearer explanation on "What must actually pass the 30-minute Cobb Test? The "combined" (corrugated) fiberboard or the "base material" (outer liner component only)? Situation in question is this; the Cobb Test is conducted on the "combined" (corrugated fiberboard material) and it fails to pass the Cobb Test. If the Cobb Test was then conducted on the actual "base material" (outer liner component only) that was actually used in said box and the base material passes, which set of results should we use?

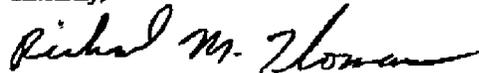
Example:	Combined Board Results	Base Material Only Results
	153	107
	149	100
	150	107
	186	106
	153	104
	158.2	105

Which result do you use to determine if the Cobb Test passes or fails? If any individual result fails or when the average fails? 49 CFR 178.516 does not specifically provide answers to these questions it only refers ISO 535. After reviewing the most recent version of ISO 535, ISO uses the average of the sample group to determine if the test passes or fails.

An expedited response to these questions would be greatly appreciated since it is costing our customers money and may be jeopardizing safe transportation of hazardous materials in commerce.

If you have any further questions, please feel free to contact me by phone at (630)-794-0331 or by fax at (630)-794-0431. A speedy reply would be appreciated. Thank you.

Sincerely,



Richard M. Thomas  
 Packaging Performance Specialist

cc. Jim Mackowski - Smurfit-Stone Container Corporation Westmont Technical Center

Smurfit-Stone Container Corporation  
 910 Pasquinelli Drive Westmont, Illinois 60559-5526 phone 630-920-9600 fax 630-920-9601

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