

Non-Bulk Packaging/Transportation: Pipeline and Hazardous Materials Safety Administration Addresses Selective Testing Requirement



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The United States Pipeline and Hazardous Materials Safety Administration (“PHMSA”) addressed in a July 8th letter clarification of the Hazardous Materials Regulations (“HMR”) applicable to packaging selective testing requirements.

The letter responds to a query from Mauser Packaging Solutions (“MPS”) seeking guidance regarding the design type changes and selective testing requirements for non-bulk packagings in 49 C.F.R. § 178.601.

MPS posed two questions.

First, the company asks whether variations in the material of closure for the cover of an open-head UN1A2 steel drum constitute a "different packaging" design type for which design qualification and periodic testing is required.

PHMSA answers in the negative. It states:

As provided in § 178.601 (g)(8)(xii), variations to the material used for the cover (i.e., the closure) of a UN1A2 steel drum would not be considered a different drum design.

A qualification is added that the exception only applies to a UN1A2 steel drum.

Second, confirmation is sought that based on a historical Letter of Interpretation (Ref. 99-0054) and the testing requirements found in § 178.601(g)(5), that selective testing under Variation 5 encompasses all single packaging design types, including closures (i.e., closure devices) and gaskets on the cover of a UN1A2 steel drum.

PHMSA agrees with this interpretation. It states that:

In accordance with § 178.601(g)(5), a single packaging that differs from a tested design type only to the extent that the closure device or gasketing differs from that used in the original tested design type may be used without further testing provided an equivalent level of performance is maintained, subject to the conditions contained in § 178.601(g)(5)(i) and (ii).

A copy of the letter can be downloaded [here](#).