



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety Administration**

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

MAR 16 2007

Mr. H. Perry Hock
Technical Director
Hock Package & Product Testing
and Consulting, Inc.
4090 Thunderbird Lane
Fairfield, OH 45014-2234

Ref. No.: 07-0009

Dear Mr. Hock:

This is in response to your January 16, 2007 letter regarding selective testing of packagings under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if partition dividers may be added to a packaging tested in accordance with Variation 2 under § 178.601(g)(2).

The answer is yes, provided the dividers do not replace any integral cushioning material present in the original testing of the packaging design type. Variation 2 allows inner packagings of any type in an outer packaging without retesting if the specific conditions of the variation are met. Therefore, as long as the conditions in § 178.601(g)(2) are met, the addition of dividers does not require further testing.

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

Sincerely,

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



070009

178.601(g)(2)

Pollack
8178-601(9)2
Testing
07-0009



gh Package
& Product
Testing and
Consulting, Inc.

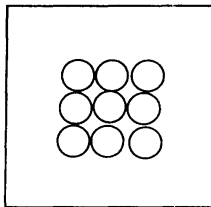
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Don,

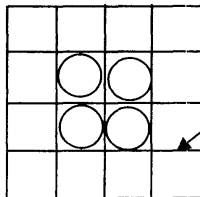
Question regarding a 4GV from a customer:

The ship a 18 x 18 inch box – the pack passed with 9 bottles in the center. There is was no cushioning between the bottles, and there was 3 inches of cushioning between the bottles and the exterior.

Top view



Can they use a 4 x 4 divider, filling the void spaces with the same cushioning, that would look like this from the top: It would actually increase the filling between the bottles and the exterior wall from 3", to just under 4 1/2"



Partition not present
during testing

Thanks,
H. Perry Hock
gh Package & Product, Testing and Consulting, Inc.
513.870.0080 ext 103