



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

APR 11 2001

Mr. William C. Shreves
Total Quality Control Associates
4712 Woodward Ave.
Downers Grove, IL 60515

Reference No.: 00-0237

Dear Mr. Shreves:

This is in response to your August 17, 2000 letter concerning the hydrostatic test prescribed in 49 CFR 178.605. Specifically, you state that one of your 2-inch closures also has a 3/4-inch closure in its center. You asked if the pressure applied into the packaging may be introduced through the 3/4-inch opening instead of adding another opening in the packaging.

If the closure has been previously hydrostatic pressure tested, then this test method would be acceptable. If it has not been previously pressure tested, then the answer is no; the pressure may not be applied through the 3/4-inch opening. Section 178.602(a) and (e) requires that 1) each package and packaging must be closed in preparation for testing, and 2) the tests must be carried out on the packages prepared as if for actual shipment.

I hope this satisfies your request.

Sincerely,

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



00-0237

178.605

TOTAL QUALITY CONTROL ASSOCIATES

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Corbin
§ 178.605
Hydrostatic Pressure
test

00-0237

August 17, 2000

Research and Special Programs Administration
Office of Hazardous Material Standards (DHM-10)
U.S. Department of Transportation
400 Seventh Street, S.W.
Washington, DC 20590-0001

Dear Sirs,

As a Quality Systems Consultant, I have clients in the non-bulk container industry. A question regarding Subpart M, Section 178.605, Hydrostatic pressure testing has been asked.

It is understood that the samples must be tested with their closures in place. However, if one of the 2 inch closures also has a 3/4 inch closure included within the center of it, can the test pressure be introduced through this smaller opening?

This method would preclude the necessity of introducing another opening in the container, for example, a fitting such as a tire valve with the stem removed.

Thank you in advance for your cooperation.

Respectfully,



William C. Shreves
T.Q.C.A.

WCS/jb