



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, DC 20590

April 29, 2025

Erin Gaul  
Senior Consultant  
Labelmaster Services Inc.  
5724 North Pulaski Rd  
Chicago, IL 60646

Reference No. 24-0092

Dear Ms. Gaul:

This letter is in response to your October 1, 2024, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to limited quantity shipments. In your email, you state that retailers request that distribution centers ship consumer products under the limited quantity exceptions for flammable liquids in 49 CFR § 173.150(b). You note that these products—such as bottles of cologne—are placed into a corrugated retail packaging, which is then placed into a plastic poly bag.

Does the packaging—as pictured in your email—meet the requirements in 49 CFR § 173.150(b), which requires that limited quantities of flammable liquids be packaged in combination packagings with a strong outer packaging? Is it true that limited quantities shipped in accordance with 49 CFR § 173.150(b) may not use plastic poly bags as the outer packaging?

Based on the pictures and descriptions provided in your email, it is the opinion of this Office that the plastic poly bags would not qualify as a strong outer packaging as required in 49 CFR § 173.150(b). Section 171.8 defines a strong outer packaging as “the outermost enclosure that provides protection against the unintentional release of its contents. It is a packaging that is sturdy, durable, and constructed so that it will retain its contents under normal conditions of transportation.” The plastic poly bags as shown in your email, do not appear to meet this definition.

However, please note that we cannot determine if the corrugated retail packaging described in your email may itself meet the definition of a strong outer packaging—that must be determined by the offeror. If the corrugated retail packaging meets all the applicable HMR requirements and is considered the strong outer packaging, the plastic poly bag could be used as an overpack provided it meets the requirements in 49 CFR § 173.25.

I hope this information is helpful. Please contact us if we can be of further assistance.

Sincerely,

A handwritten signature in blue ink that reads "T. Glenn Foster". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

T. Glenn Foster  
Chief, Regulatory Review and Reinvention Branch  
Standards and Rulemaking Division