

Alert 14-13: Guidelines for U.S. Department of Transportation Closure Instructions – Manufacturer’s and Shipper’s Responsibilities

A critical component of safely shipping hazardous materials is preparing and closing each package properly after filling. Improper application of closures is the leading cause of leakage from filled packages during transportation. This is of particular concern with hazardous materials since most are dangerous if released. For this reason, U.S. Department of Transportation (DOT) regulations require that all packaging manufacturers notify each person to whom the packaging is transferred of all requirements not met at the time of transfer. This requirement is codified in Title 49 of the Code of Federal Regulation’s (49 CFR) §178.2 (c).

Specifically, the manufacturer must specify the types and dimensions of the closures, including gaskets and any other components needed to ensure that the packaging is capable of successfully passing performance tests. Closure instructions must provide for a consistent and repeatable means of closure that is sufficient to ensure the packaging is closed in the same manner in which it was tested. This information must also include any procedures to be followed to effectively assemble and close the packaging for the purpose of preventing leakage in transportation.

Closure instructions may be transferred in several ways including:

- Written notice or electronic means, including email or transmission on a CD or similar device
- Embossment on the package
- Printing on the package

Simply posting the required information on a website does not meet DOT requirements.

Shippers also have responsibilities regarding DOT closure instructions. These responsibilities are outlined in 49 CFR §173.22 (a)(4).

The person who performs the closing of the package must perform all functions necessary to bring the package into compliance with parts 173 and 178. For example, applying closures consistent with the manufacturers’ closing instruction in accordance with 49 CFR §178.2. Each person must maintain a copy of the manufacturer’s notification unless the notification is permanently embossed or printed on the packaging. The person performing the closing function must also train his or her personnel to follow the closure instructions and provide the specified tools to complete closure.

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