

December 29, 2005

To: All gh Testing United Nations non-bulk and intermediate bulk package testing clients

From: H. Perry Hock
President and Technical Director
gh Package & Product Testing and Consulting, Inc.
4090 Thunderbird Lane
Fairfield, OH 45014

RE: New Department of Transportation reporting requirements imposed onto all 3rd party testing agencies

I am sorry to inform you, our customer, that the Department of Transportation has issued mandatory requirements for all third party agencies (laboratory testing facilities). These requirements include a new report format as well as additional information to be provided to gh Testing from the contracting agency (our customers).

Attached you will find a copy of our new approval from the Department of Transportation. There are several areas which I will briefly explain the requirements.

5 c. – These are the package types for which we are currently authorized to certify. If you do not see your type, please let gh Testing know, as we can have it added to our approval.

6 b. – This is the paragraph that requires the report to follow the outline in Appendix A. This paragraph also specifies the minimum required information found in Appendix B to be provided to gh Testing.

Please note that Section 5 of the report **REQUIRES** packaging design drawings for **ALL** packaging components.

6 e – We must supply the Department of Transportation the following:

- gh Package & Product Testing and Consulting, Inc.'s address
- The packaging standard for which each approval was granted
- The name and physical address (no PO box allowed) for each company for which a test was performed
- The date of the completed testing

6 g – gh Testing must submit representative reports of each design type tested to the Department of Transportation twice a year.

To assist in clarifying what is required for a non-bulk combination pack, here is a basic example: The pack is a 4 x 1 gallon shipper with a z pad separating ½ of the bottles. There is a bottom corrugated pad and a top EPS pad. The case is closed with pressure sensitive tape. The required information can be found in Appendix B of the Approval for EACH of the following:

Fiberboard Box*

Fiberboard Box Closure (tape)

*EPS Pad**:

Material

Style

Density

Resin manufacturer

All Dimensions

Tare weight

Method of construction

Manufacturer (not supplier)

Corrugated Z Pad* (same requirements as a fiberboard box)

Plastic Bottle*

Plastic bottle closure (cap)*

Closure's Liner

Closure means and or method (Note: either torque or a repeatable, measurable method is required. Hand tighten is not allowed by the DOT)

* All components are required to have a design drawing to be provided to gh Testing. This drawing will be inserted into the report. If no drawing is available, one may be provided by gh Testing for an additional fee.

Italics: Not found in Appendix B but required under the packaging component clause of 6.b.

Additional materials not specifically listed in the approval, but fall under the 'packaging components' requirement to have significantly more detail:

Bubble wrap

Cushioning material

Absorbent materials, including absorbent capacity, and granule size for products such as vermiculite

Twist tie closures

Zip tie closures

Additional, non hazardous components in the pack

The above list is not complete, so please contact gh Testing for more information.

It is also required that actual basis weights for all fiberboard packaging components be listed on the report. Therefore, gh Testing will begin performing basis weight on all components. As with the exterior of the pack, these can not change from the tested

DOT Notification Letter

November 14, 2005

Page 3 of 3

design type. Please ask your fiberboard provider/supplier to verify the components to ensure they, as well as the box, are what you want certified.

Gh Testing has also been advised by the Department of Transportation not to perform the required testing until all of the required information is provided to gh Testing.

Due to the additional requirements imposed onto gh Testing by the Department of Transportation, our pricing for UN\DOT testing will increase. The pricing for a 4G combination pack will be \$ 1,150.00 for liquids for air shipment, and to \$ 1,050.00 liquids for surface shipment and solids. Single packs, Diagnostic Specimens, Class 6.2, Medical Waste, Mercury, Class 7, and IBC packagings will be quoted separately.

Over the next few years, these requirements will also be imposed on all companies who choose to self certify, and should they not meet the requirements, the penalties will be awarded as such.

If you have any questions regarding the actual approval please contact me at gh Testing. If you have questions as to why this is required or specifically what is required, I have been instructed by the Department of Transportation to give you the contact information of the individual at the Department of Transportation.

Dept. of Transportation:
Donald Burger
General Engineer
1 (202) 366-4545
Office of Hazardous Materials Technology

We appreciate your patronage and want you to continue to choose gh Testing for many years to come.

Sincerely,

H. Perry Hock
President and Technical Director
gh Package & Product Testing and Consulting, Inc.

Enclosure