



U.S. Department  
of Transportation

**Research and  
Special Programs  
Administration**

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

JUN - 4 1998

Mr. David B. Caria  
Director, Regulatory Affairs  
VWR Scientific Products  
Goshen Corporate Park West  
1310 Goshen Parkway  
West Chester, PA 19380

Ref. No. 98-0020

Dear Mr. Caria:

This is in response to your letter of April 8, 1998, regarding units of measurement required in a shipping paper entry in accordance with 49 CFR § 172.202(a)(5). Specifically, you ask whether the gross weight of the package in pounds would be an appropriate unit of measurement.

The answer is yes. Section 172.202(a)(5) requires, except for empty packages, cylinders, and bulk packages, that the total quantity including the unit of measurement of the hazardous materials covered by the description be included in the shipping papers. Total quantity may be entered as net weight, gross weight, capacity, or as otherwise appropriate. Pounds may be used as an adequate unit of measurement to express either net or gross weight.

I hope this satisfies your request.

Sincerely,

Delmer F. Billings  
Chief, Standards Development  
Office of Hazardous Materials Standards

172.202

# VWR Scientific Products

Contractor  
7.22: 172.202(a)(5)

Goshen Corporate Park West  
1310 Goshen Parkway  
West Chester, PA 19380  
Main (610) 431-1700

April 8, 1998

Mr. Edward Mazzullo, DHM-10  
DOT/RSPA/OHMS  
400 7th Street, S.W.  
Washington, DC 20590

RE: Request For An Opinion

Dear Mr. Mazzullo:

VWR Scientific Products is a distributor of laboratory supplies. As part of this, we ship many small packages of liquid hazardous materials. It is presently our practice to show the total quantity contained in each combination package as gross weight of the package in pounds. It is our belief that this is an appropriate unit of measure as required by 49 CFR 172.202 (a)(5).

I respectfully request your opinion on whether or not gross weight in pounds is an appropriate unit of measure for relatively small quantities of liquid hazardous chemicals shipped in combination packages. Four liters of acetone in a glass bottle, packaged in a 4GV package would be a typical shipment.

If you have questions or need clarification, I can be reached at 610-429-2814.

Sincerely,



David B. Caria  
Director Regulatory Affairs

DC/amb