



U.S. Department
of Transportation

Research and
Special Programs
Administration

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

Corporal W.T. Rucker III
Hazardous Material Unit
S.C. State Transport Police
800 Dutch Square Blvd.
Dutch Plaza Suite 205C
Columbia, SC 29210

Ref. No. 98-0315

Dear Corporal Rucker:

This is in response to your letter of October 9, 1998, regarding requirements to identify marine pollutants on shipping papers under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically you ask if it is acceptable to describe leaded gasoline on a shipping paper as "Gasoline (leaded), 3, UN1203, PG II, Marine Pollutant."

The answer is yes. Section 172.203(1)(1) states that if a proper shipping name for a material that is a marine pollutant does not identify the component making it a marine pollutant, the name of that component must appear in parentheses in association with the basic description. A previous letter of clarification dated October 19, 1993 (enclosed) states the shipping name "Gasoline" and the notation "Marine Pollutant" which appear as part of the proper shipping description are sufficient to identify the marine pollutant "Gasoline, leaded." It is the opinion of this Office that the description "Gasoline, (leaded), 3, UN1203, PG II, Marine Pollutant" is also an acceptable description for leaded gasoline.

I hope this satisfies your request.

Sincerely,

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

Enclosure



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