



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

MAR 15 1999

Mr. William J. Briner
Regulatory Affairs Manager
Monsanto Company
800 N. Lindbergh Boulevard
St. Louis, Missouri 63167

Ref. No. 98-0349

Dear Mr. Briner:

This is in response to your letter dated November 5, 1998, regarding § 172.201(a)(1)(iii) of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask whether a shipping paper may have a column heading of "HM DG" (or some variation thereof), rather than a column heading of just "HM."

The shipping paper requirement in § 172.201(a)(1)(iii) specifies that a shipping paper, containing both a regulated hazardous material and a non-regulated material, may identify the hazardous material by placing an "X" in a column captioned "HM." The column heading you describe in your letter would not be in compliance with the HMR. The "DG" column heading is not acceptable because it would be the use of a non-authorized abbreviation and non-authorized code.

I hope this satisfies your request.

Sincerely,

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

Monsanto

BDH

Monsanto Company
800 N. Lindbergh Boulevard
St. Louis, Missouri 63167
Phone: (314) 694-1000

§ 172.201

November 5, 1998

U.S. Department of Transportation
Research and Special Programs Administration
Office of Hazardous Materials Standards
400 Seventh Street, S.W.
Washington, D.C. 20590
Attn: Mr. Thomas Allan

Dear Mr. Allan:

I am writing to request a written interpretation concerning 49 CFR 172.201(a)(1)(iii), which allows an "X" to be placed before the proper shipping name in a column captioned "HM".

Monsanto Company is designing a single shipping paper for use not only in the United States but also in other countries. One of our offices in another country has requested that the "HM" column heading be changed to

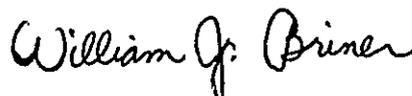
HM
DG

"HM" corresponding to "hazardous materials" and "DG" corresponding to "dangerous goods".

Please indicate if a column heading containing the letters "HM" on the first line and the letters "DG" immediately below it on the second line is in compliance with 49 CFR 172.201(a)(1)(iii).

If you have any questions concerning this, please call me at (314) 694-2999.

Sincerely,



William J. Briner
Regulatory Affairs Manager