



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

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

DEC - 5 2005

Ms. Jennifer Eberle
Manager, Transportation Compliance
Onyx Environmental Services, LLC
1705 Route 46 West, Unit #2
Ledgewood, NJ 07852

Ref. No. 05-0277

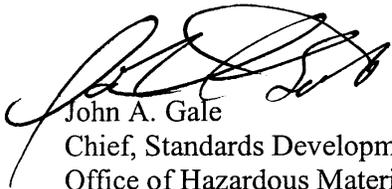
Dear Ms. Eberle:

This is in response to your letter dated October 24, 2005, and subsequent telephone conversation with a member of my staff requesting clarification of the proper shipping name requirements of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you inquired about the proper placement of italicized words within a shipping description.

Italicized information may be utilized in addition to the proper shipping name (§172.101(c)(2)). The overall orientation of additional information is optional; however, the preferred sequence for the proper shipping name is established by the Hazardous Material Table (HMT) (§ 172.101(c)(4)). In the example you provide, a shipper is preparing adhesives for transportation and includes italicized information on the shipping paper. In that case both "Adhesives, *containing a flammable liquid*, 3, UN 1133, PG I" or "Adhesives, 3, UN 1133, PG I, *containing a flammable liquid*" are acceptable proper shipping descriptions. The first description utilizes the sequence found in the HMT and is preferred.

I hope this satisfies your request.

Sincerely,



John A. Gale
Chief, Standards Development
Office of Hazardous Materials Standards



050277

171.8
172.101(c)



ENVIRONMENTAL SERVICES

BAH
§ 171.8
§ 172.101 (c)
Shipping Name
05-0277

October 24, 2005

Mr. Edward Mazzullo, Director
US Department of Transportation
Pipeline and Hazardous Materials Safety Administration
400 Seventh Street, SW
Washington D.C. 20590-0001

Dear Sir,

I am writing this letter to obtain an interpretation that describes the proper placement of italicized words within a shipping description. As indicated in §§171.8 and 172.101(c), it is clear that words in italics are not part of the proper shipping name, but may be used in addition to the proper shipping name.

It is my interpretation that when including the italicized words within a shipping description, they would be placed immediately following the proper shipping name and immediately preceding the hazard class as indicated in the Hazardous Materials Table:

Adhesives, *containing a flammable liquid*, 3, UN1133, PG I

Please provide a response indicating whether my interpretation of the placement of the italicized words is correct. If it is not correct, please provide clarification that details what the proper placement would be.

Thank you for your assistance,

Jennifer Eberle
Manager, Transportation Compliance
Onyx Environmental Services, LLC