



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, D.C. 20590

NOV 19 2007

Mr. Chris W. Gibson
EHS&R Manager
Hawkins, Inc.
3100 East Hennepin Avenue
Minneapolis, MN 55413

Ref. No.: 07-0213

Dear Mr. Gibson:

This is in response to your November 2, 2007 letter requesting clarification of the transition compliance date for the shipping description sequence in § 171.14(e) of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180).

Your questions are paraphrased and answered as follows:

Q1: Does the transition compliance date of January 1, 2013 apply to domestic and/or international shipments of hazardous materials?

A1: The transition compliance date in § 171.14(e) generally applies to domestic shipments of hazardous materials. The sequence change in § 172.202(b) was incorporated to align the HMR with international requirements. Most international regulations that are authorized for use by the HMR already require the new sequence to be used. For background on the shipping description sequence please review Docket HM-215I (71 FR 78596; December 29, 2006). As provided by the December 29, 2006 final rule and in § 172.202(b) of the HMR, beginning January 1, 2013, the HMR will require hazardous materials shipments to be identified on the shipping paper in the sequence of identification number, proper shipping name, hazard class or division number, and packing group.

Q2: Is the proper shipping name and identification number marking in § 172.301(a) required to be in the same sequence as the shipping description?

A2: No. Section 172.301(a) does not require a specific sequence for marking the proper shipping name and identification number on a package.

I hope this information is helpful. Please contact us if you require additional assistance.

Sincerely,

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

HAWKINS, INC.

NO. 0720 P. 1

Supko
§ 171.14 (d)
§ 171.14 (e)
§ 172.301 (a)
Marking
07-0213

November 2, 2007

Mr. Edward T. Mazzullo
Director, Office of Hazardous Materials Standards
U.S. DOT/PHMSA (PHH-10)
400 7th Street S.W.
Washington, D.C. 20590-0001

URGENT REQUEST FOR INTERPRETATION

RE: 49 CFR 171.14(e), 171.14(d), 172.301(a)

Dear Mr. Mazzullo:

There has been some confusion as to the dates of compliance shown in 171.14(e), and the methods of compliance required under 171.14(d) & 172.301(a).

Question:

1. Does the transition compliance date of the January 1, 2013 with the shipping descriptions sequence apply to:
 - a. Domestic shipments?
 - b. North American Shipments?
 - c. International (non-North America) shipments?
 - d. Or a combination of the above?

2. 172.301(a) requires the proper shipping name and UN# be marked on non-bulk containers. What is the proper sequence for this to appear on the container?
 - a. PSN followed by UN#
 - b. UN# followed by PSN
 - c. A particular order is not required.

If you have any questions, I can be reached at 612-331-6910, x8551 or at chris.Gibson@hawkinsinc.com

Thank you.

Sincerely,


11/2/07

Chris W. Gibson
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