



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

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

APR 02 2012

Jamie Newton
Waste Disposal Coordinator
Environmental Management, Inc.
5200 N.E. Highway 33
Post Office Box 700
Guthrie, OK 73044-0700

Reference No.: 11-0291

Dear Jamie Newton:

This is in response to your November 10, 2011 letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). You ask several questions pertaining to the identification numbers of hazardous materials. Your questions are answered as follows:

Q1. When the HMR refers to the identification number are they referring to just the numerical digits in Column (4) of the §172.101 Hazardous Materials Table?

A1. The HMR does not specifically define whether the term "identification number" refers to just the numerical digits in Column (4) of the §172.101 Hazardous Materials Table or also includes the prefix "UN," "NA," or "ID." The identification numbers preceded by the letters "UN" are associated with proper shipping names appropriate for both domestic and international transportation. Those preceded by the letters "NA" are only used in domestic transportation and are not recognized internationally, except to and from Canada (see § 172.101(e)). Under Docket HM-215K (76FR 3308;1/19/11), paragraph (e) of § 172.101 added an explanation for identification numbers associated with certain descriptions under the International Civil Aviation Organization's Technical Instructions for the Safe Transport of Dangerous Goods by Air (ICAO Technical Instructions) and are preceded by the letters "ID."

Q2. Are the letters "UN" or "NA" optional on the markings required by § 172.332?

A2. The use of the letters "UN" or "NA" is not optional as part of the identification number. Identification number markings must be displayed on bulk packagings in accordance with § 172.332. Section 172.332 provides three options for displaying an identification number marking. Identification numbers (numerals only) may be displayed on: (1) an orange panel; (2) a placard; or (3) a plain white square-on-point display configuration as prescribed in § 172.336(b). The International Maritime Organization's Dangerous Goods Code (IMDG Code) and the United Nations Recommendations on the Transport of Dangerous Goods:

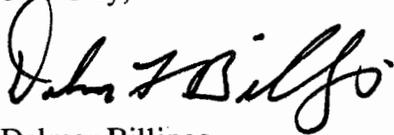
Model Regulations (UN Model Regulations) also specify the display of identification number markings on bulk packagings without the "UN" prefix.

Q3. Are the letters "UN," "NA," or "ID" optional in the proper shipping description of a hazardous material?

A3. The use of the letters "UN," "NA," or "ID" is required to be included as part of the identification number in the shipping description of a hazardous material on a shipping paper. The shipping description must include the identification number (with the letters "UN," "NA," or "ID"), the proper shipping name, hazard class, and packing group, for example: "UN1090, Acetone, 3, PGII." The ICAO Technical Instructions, IMDG Code, and the UN Model Regulations also require the use of the prefix "UN" or "ID" with the identification number in the shipping description.

I hope this satisfies your inquiry. Please contact us if we can be of further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Delmer Billings". The signature is written in a cursive style with a large initial "D".

Delmer Billings
Senior Regulatory Advisor
Standards and Rulemaking Division



Babich
§172.101(e)
§172.202(2)
§172.332
Applicability
11-0291

Environmental MANAGEMENT

November 10, 2011

U.S. DOT
PHMSA Office of Hazardous Materials Standards
Attn: PHH-10
East Building
1200 New Jersey Avenue, SE.
Washington, DC 20590-0001

To Whom It May Concern:

Re: 172.101(e), 172.202(1) and 172.332

Please accept this letter as a request for a formal interpretation from your office. Environmental Management, Inc. wishes to receive clarification of what, exactly, constitutes the "Identification Number" of a hazardous material.

- Question 1: When the HMR refers to the identification number, are they referring to just the numerical digits in column 4 of the Haz Mat Table?
- Question 2: Are the letters UN or NA Optional on the markings required by 172.332?
- Question 3: Are the letters UN or NA optional in the proper shipping description of a hazardous material?
Example: 1993, Flammable Liquid, N.O.S., (Acetone, Toluene) 3, PGIII

Thank you in advance for your time and input on these questions. Please contact me at jnewton@emiok.com, or (405) 282-8510 if there is a need for clarification to adequately address these questions.

Regards,

Jamie Newton
Waste Disposal Coordinator
Environmental Management, Inc.

for an environment we can all live with today & tomorrow