



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

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

**MAY 30 2012**

Mr. John McQuaid  
Industrial Packaging Alliance of North America  
P.O. BOX 100907  
Arlington, VA 22210-3907

Reference No.: 12-0071

Dear Mr. McQuaid:

This responds to your March 6, 2012 letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the marking of steel drums. Specifically, you ask if a manufacturer is permitted to use a three-line mark instead of a four-line mark that contains the pertinent information without listing the month of manufacture, US origin, and M-number twice.

The answer is no. Section 178.503(a) states that the packaging must bear the marks as specified in (a)(1) through (a)(6) of this section. It then states that the marking may be applied in a single line or in multiple lines provided the correct sequence is used. In removing the month of manufacture, US origin, and M-number as shown in your letter, the marking would no longer meet the requirements of § 178.503(a) which requires that the information on the marking be presented in the correct sequence, and, therefore would not be in compliance with the HMR.

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 "T. Glenn Foster".

T. Glenn Foster  
Chief, Regulatory Review and Reinvention Branch  
Standards and Rulemaking Division

Andrew  
\$178.503  
IBC

**Drakeford, Carolyn (PHMSA)**

**From:** Foster, Glenn (PHMSA)  
**Sent:** Tuesday, March 06, 2012 7:21 AM  
**To:** Drakeford, Carolyn (PHMSA)  
**Cc:** Betts, Charles (PHMSA); Billings, Delmer (PHMSA); Kelley, Shane (PHMSA); Supko, Ben (PHMSA)  
**Subject:** FW: Inquiry on Content on Durable Marking on Steel Drums  
**Attachments:** Durable Mark Inquiry - New Labeler(1).pdf  
**Importance:** High

12-0071

Good morning, Carolyn.

Please log in the attached as a formal request for interpretation and assign.

Thanks,  
Glenn

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**From:** John McQuaid [<mailto:mcquaid@industrialpackaging.org>]  
**Sent:** Monday, March 05, 2012 6:13 PM  
**To:** Foster, Glenn (PHMSA)  
**Subject:** Inquiry on Content on Durable Marking on Steel Drums  
**Importance:** High

Mr. Foster,

I am writing on behalf of a member of the Steel Shipping Container Institute (SSCI) of IPANA that is in the process of updating its durable marking technology at its steel drum manufacturing facility. They have asked me to inquire as to whether the change in the content on a planned new durable mark labeler meets with the requirements of the regulations.

As indicated in the attached illustration, the manufacturer is inquiring whether the proposed reduction from a four-line durable mark that duplicates the CFR-required information to a new three-line mark that contains the pertinent information without listing the month of manufacture, US origin, and M-number twice meets regulatory requirements.

We would appreciate PHMSA's position with respect to this inquiry.

An expedited response to this inquiry would be appreciated as the manufacturer's upgrade is contingent, somewhat, on PHMSA's reply.

Thank you.

Cordially,

**JOHN A. MCQUAID**  
[www.industrialpackaging.org](http://www.industrialpackaging.org)  
Industrial Packaging Alliance of North America  
**PHONE: 571.527.0779**  
**CELL: 703.629.6239**

**IPANA 10th ANNUAL MEETING**  
**April 15 - 17, 2012**

**Evergreen Marriott, Stone Mountain, GA**

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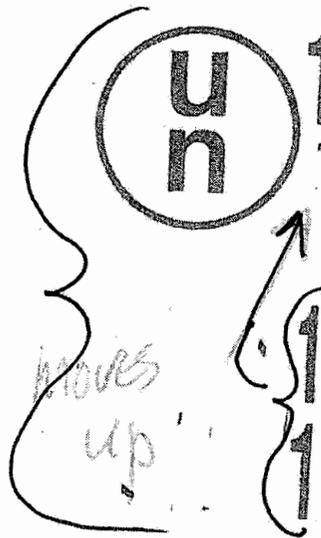
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