

May 1, 2025

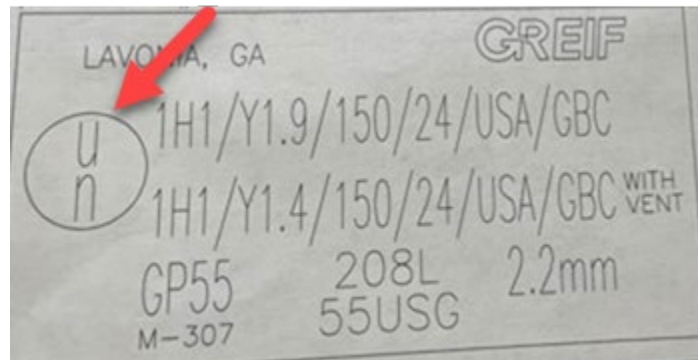
Mr. Shane Kelley  
Director, Standards and Rulemaking Division  
U.S. DOT/PHMSA (PHH-10)  
1200 New Jersey Avenue, SE East Building, 2nd Floor  
Washington, DC 20590  
Submitted via email to [infocntr@dot.gov](mailto:infocntr@dot.gov)

**Letter of Interpretation Request**

Dear Mr. Kelley:

On behalf of Greif Inc. (GBC), this communication is to request a formal letter of interpretation around the requirements for marking UN packaging in 49 CFR 178.503. Specifically, Greif wishes to understand whether a single UN symbol can be used to meet the requirements of 178.503(a)(1) when multiple (2 or more) markings are included on a packaging.

To better illustrate the question, the below graphic highlights the above-mentioned scenario where a 1H1 plastic drum carries two markings in the embossment.



While the requirements for the inclusion of the lowercase UN symbol in a mark are clear, the CFR text does not make clear whether each mark must begin with a separate UN symbol, or if one large symbol at the beginning of each mark fulfills the requirement.

Thank you for your attention and response to Greif's request for a formal letter of interpretation.

Sincerely,



John Foryt  
Director, Global Product Safety & Compliance  
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