



U.S. Department  
of Transportation  
**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, DC 20590

July 15, 2025

John Foryt  
Director, Global Product Safety & Compliance  
Global Industrial Packaging  
366 Greif Parkway  
Delaware, Ohio 43015

Reference No. 25-0060

Dear Mr. Foryt:

This letter is in response to your May 1, 2025 email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to markings on UN specification non-bulk performance-oriented packagings. Specifically, can a single UN symbol be used to meet the requirements in § 178.503(a)(1) when multiple (*e.g.*, two or more) markings are included on a packaging.

No. In accordance with § 178.3(c), the HMR specifically states if more than one marking appears on a packaging, each marking must appear in its entirety. Thus, each marking string must include its own UN symbol or the letters “UN” as part of the marking string.

I hope this information is helpful. Please contact us if we can be of further assistance.

Sincerely,

A handwritten signature in blue ink, appearing to read "Dirk Der Kinderen".

Dirk Der Kinderen  
Chief, Standards and Development Branch  
Standards and Rulemaking Division

May 1, 2025

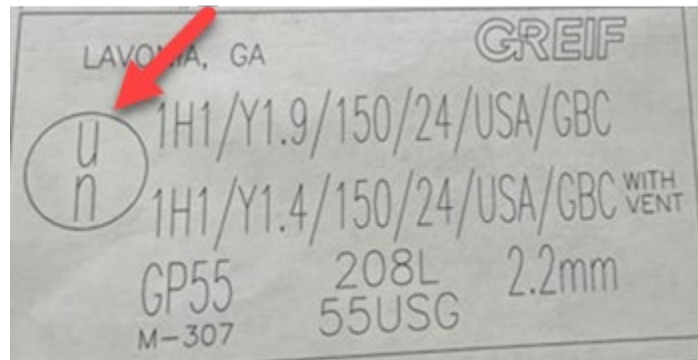
Mr. Shane Kelley  
Director, Standards and Rulemaking Division  
U.S. DOT/PHMSA (PHH-10)  
1200 New Jersey Avenue, SE East Building, 2nd Floor  
Washington, DC 20590  
Submitted via email to [infocntr@dot.gov](mailto:infocntr@dot.gov)

**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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614-499-4919