



March 2, 2026

Mr. Matthew Nickels
Acting Director, Standards and Rulemaking Division
U.S. DOT/PHMSA (PHH-10)
1200 New Jersey Avenue, SE, East Building, 2nd Floor
Washington, DC 20590

Dear Acting Director Nickels,

Thank you for your time regarding this matter. Redwood Materials is requesting a letter of interpretation on prohibited marking and labeling of packaging. Specifically, we seek clarification on what meets the definition of a “packaging is not visible in transportation,” as it appears in 49 CFR §§ 172.303, 172.401, and 173.29, and whether certain conditions might allow for hazard markings and labels to remain on the outside of the packaging.

We seek specific clarification as to whether the following scenario fits the definition of “packaging is not visible in transportation” and whether it would then be permissible to offer these packagings without removing, voiding, covering, or obliterating hazard markings and labels on the individual packagings. The scenario is as follows: an offeror is returning multiple empty packagings that previously contained hazardous materials, the packaging is loaded by the offeror, unloaded by the consignee, and is transported by the carrier in dedicated service (i.e., no other stops). In this scenario, none of the packaging hazard marks or labels would be visible when viewing the trailer or freight container from the outside. In this scenario, would the packaging being inside a closed trailer or freight container constitute “not visible in transportation?”

We appreciate your attention on this. Please let me know if you require any additional information.

Regards,

Neal Suchak
Staff Program Manager, Dangerous Goods
Redwood Materials
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Reference documents: 49 CFR §§ [172.303](#), [172.401](#), [173.29](#), PHMSA Interpretations [#02-0064](#), [#06-0230](#), [#19-0089](#)

