



U.S. Department
of Transportation

1200 New Jersey Avenue, SE
Washington, DC 20590

**Pipeline and Hazardous
Materials Safety
Administration**

MAR 06 2018

Lori Podolak
Senior RA/QA Specialist
QSA Global, Inc.
40 North Avenue
Burlington, MA 01803

Reference No. 17-0079

Dear Ms. Podolak:

This letter is in response to your July 6, 2017, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the marking of U.S. Department of Transportation (DOT) Specification 7A packagings. You state § 178.350(b) specifies that packaging conforming to DOT Specification 7A criteria must be marked with “USA DOT 7A Type A” and “Radioactive Material.” You include in your email a picture of a marking that indicates the proper shipping name, the specification packaging type, and the country of origin; however, the words “Type A Package” are placed in conjunction with the proper shipping name as opposed to being in line with the packaging specification. Specifically, you ask whether it is acceptable to mark a DOT Specification 7A package in a sequence other than that which appears in the HMR.

The answer is no. “USA DOT 7A Type A” is a given packaging specification that is required to be marked in accordance with § 178.350(b). The HMR do not permit deviation in words or sequence from that which appears in quotation marks. Additionally, note that the words “Radioactive Material” are no longer required as part of the specification marking. The January 26, 2004, final rule titled “Hazardous Materials Regulations: Compatibility with the Regulations of the International Atomic Energy Agency” (HM-230; 69 FR 3632) removed this requirement since those words appear as part of the proper shipping name (PSN) for all radioactive materials.

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

Sincerely,

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

Casey
§178.350 (b)
Marking
17-0079

Dodd, Alice (PHMSA)

From: INFOCNTR (PHMSA)
Sent: Thursday, August 03, 2017 9:15 AM
To: Dodd, Alice (PHMSA)
Subject: FW: Request for Interpretation on Marking Requirements of 49 CFR 178.350(b) Specification 7A
Attachments: Interpretation Request Letter 49 CFR 178.350 Marking dated 07062017.pdf

From: INFOCNTR (PHMSA)
Sent: Friday, July 07, 2017 11:40 AM
To: Hazmat Interps <hazmatinterps@dot.gov>
Subject: FW: Request for Interpretation on Marking Requirements of 49 CFR 178.350(b) Specification 7A

Hi Shante/Alice,

Please submit this as a letter of interpretation. Please let me know if you have any questions.

Thanks,
Jodi

From: Podolak, Lori [<mailto:Lori.Podolak@qsa-global.com>]
Sent: Thursday, July 06, 2017 3:32 PM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Subject: Request for Interpretation on Marking Requirements of 49 CFR 178.350(b) Specification 7A

Please see the attached request for interpretation letter regarding marking compliance to this section of the regulations.

Regards,

Lori Podolak
Senior RA/QA Specialist
Regulatory Affairs/Quality Assurance Department

QSA Global, Inc.
30 North Avenue, Burlington, MA 01803

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Email: Lori.Podolak@QSA-Global.com



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For more information about QSA Global Inc.
please visit our website at <http://www.qsa-global.com>



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6 July 2017

U.S. DOT
PHMSA Office of Hazardous Materials Standards
ATTN: PHH-10
East Building
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590-001

Interpretation Request: Marking Compliance for 49 CFR 178.350(b) Specification 7A

Dear Sir or Madam:

QSA Global Inc. requests clarification on formatting of the marking specified in this section of the regulation. As currently stated, the regulation specifies that packaging conforming to the Specification 7A criteria must be marked with "USA DOT 7A TYPE A" and "Radioactive Material". Although our packaging contains all the information for this marking, the marking of "TYPE A" is included as part of the proper shipping name on the package, and it is not repeated directly after the marking for "USA DOT 7A" (see an example as shown on the right).



QSA Global has recently been advised that a representative of FedEx considers this formatting to be unacceptable since "USA DOT 7A TYPE A" does not appear as an uninterrupted sequence on the label. Can you please advise, for compliance purposes to 49 CFR 178.350(b), whether labeling that incorporates the "TYPE A" wording as part of the package marking when contained in the proper shipping name is acceptable, so long as the rest of the required marking from 49 CFR 178.350(b) is included elsewhere on the Specification 7A package?

If you have any questions or need further clarification regarding this issue, please contact me.

Sincerely,

e-Signed by Lori Podolak
on 2017-07-06 19:30:32 GMT

Lori Podolak
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Regulatory/Health Physics Department
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