



U.S. Department  
of Transportation

Pipeline and Hazardous  
Materials Safety  
Administration

1200 New Jersey Avenue, SE  
Washington, DC 20590

**MAY 31 2018**

Randolph Martin  
Sr. Consultant  
The Chemours Company  
1007 Market Street, Room 3088  
Wilmington, DE 19899

Reference No. 18-0008

Dear Mr. Martin:

This letter is in response to your January 10, 2018, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to a manufacturer's dual marking of containers. Specifically, you ask whether it is permissible for a container to be dual marked as both a United Nations specification 1A1 (UN 1A1) non-removable head steel drum and either a Department of Transportation specification 2Q (DOT 2Q) inner, non-refillable metal receptacle.

The answer is yes, provided that the packaging meets the design and testing standard in the HMR for both package specifications, in all aspects. For example, the 1 liter (L) maximum capacity specified for DOT 2Q containers is smaller than the 450 L maximum capacity specified for UN 1A1 drums (see §§ 178.33a-2 and 178.504, respectively). Therefore, a dual marked UN 1A1 drum and DOT 2Q container could not exceed 1 L capacity. The requirements for DOT 2Q design and testing are specified in Part 178 Subpart B. The requirements for UN 1A1 drum design and testing are specified in Part 178 Subparts L and M.

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

Sincerely,

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

Lehman  
~~Parker~~ Packaging  
18-0008

**January, Ikeya CTR (PHMSA)**

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**From:** INFOCNTR (PHMSA)  
**Sent:** Friday, January 12, 2018 2:27 PM  
**To:** Hazmat Interps  
**Subject:** FW: Formal Interpretation

Hello All,

Please see the below request for interp.

Regards,

-Breanna

**From:** Martin, Randy [mailto:RANDOLPH.MARTIN@chemours.com]  
**Sent:** Wednesday, January 10, 2018 2:58 PM  
**To:** INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>  
**Subject:** Formal Interpretation

This is to request a formal interpretation of the hazmat regulations.

Many retail stores (such as Walmart, Auto Zone, Home Depot and others) offer for sale R134a, a Div. 2.2 refrigerant gas, in 12 oz. cans. This product is generally used by consumers for re-charging automotive A/C systems.

Usually these cans are marked as either "DOT-2Q" or "DOT-SP XXXXX".

But lately we have seen imported cans marked as both "DOT-2Q" and "UN1A1/Y/100/16/CN/3302004". While we think it is permissible for a packaging to be dual-certified, we don't believe it is possible to be dual-certified as both a DOT 2Q inner nonrefillable metal receptacle and a UN1A1 non-removable head steel drum.

So our question - is it permissible to have a packaging dual-certified (and marked) as both a DOT 2Q inner nonrefillable metal receptacle and a UN1A1 non-removable head steel drum?

Thanks for your prompt attention to this request, and please let me know if you have any questions.

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