



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

March 17, 2023

Bill Booth
Advanced Printing Solutions
1201 Edison Drive
Cincinnati, OH 45216

Reference No. 23-0010

Dear Mr. Booth:

This letter is in response to your February 1, 2023, letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to limited quantities of “UN1210, Printing ink, *flammable* or Printing ink related material (*including printing ink thinning or reducing compound*), *flammable*, 3, PG II.” Specifically, you are shipping “UN1210” in bottles—0.475 L each—that will be packaged in boxes containing four of the bottles, and three of these boxes will be consolidated in a larger outer box (for a total of 12 bottles per outer box). You seek confirmation that the printing ink can be shipped in this manner as a limited quantity via ground transportation provided the receptacles contain no more than one liter of “UN1210” per receptacle.

Section 173.150 of the HMR offers exceptions for the transport of limited quantities of Class 3 flammable liquids provided certain conditions are met, including exception from specification packaging requirements when packaged in combination packagings, according to § 173.150(b). For Class 3 packing group II material, inner packagings must not exceed 1 L (0.3 gallons) net capacity each, packed in a strong outer packaging, and the gross weight of the package must not exceed 30 kg (66 pounds).

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 Development Branch
Standards and Rulemaking Division

Baker

From: [INFOCNTR \(PHMSA\)](#)
To: [Hazmat Interps](#)
Subject: FW: Request confirmation
Date: Wednesday, February 1, 2023 4:25:54 PM

23-0010

Please see below request for LOI.

Thanks,
Jonathon

From: shipping@kaocollins.com <shipping@kaocollins.com>
Sent: Wednesday, February 1, 2023 4:18 PM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Subject: Request confirmation

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hello to whom it may concern.

We have talked to a couple of different people from the DOT Hotline, but we do need some clarification in writing please.

REF: 49 CFR 173.150 (b) 2

Limited Quantity

We are trying to ship 12 bottles (receptacles) of .475L printing ink (UN1210 Flammable Ink). 4 of these bottles will fit into 1 box and then ship 2 others as well with it (total of 12 bottles of .475L Flammable printing ink each bottle) for a total of 3 inner boxes into 1 outer box that will hold all 12 bottles. According to how we've been told now, this CAN be shipped as Limited Quantity via the 48 states in the US, as long as the box containing all these receptacles contain no more than 1 Liter of hazardous material? We want to make sure that this is correct? This can be shipped as Limited Quantity Ground, PG II.

We do await your reply as soon as you can.

Thank you.

Bill Booth
Shipping and Receiving
Kao Collins, Inc.

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