



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, D.C. 20590

JAN 18 2008

Mr. Herb Giles  
Manager, Hazardous Materials  
Hyundai America Shipping Agency  
7701 Las Colinas Ridge, Suite 400  
Irving, TX 75063

Ref No.: 08-0004

Dear Mr. Giles:

This is in response to your letter dated November 17, 2007 regarding the shipping paper and marking requirements contained in the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) that are applicable to a portable tank containing the residue of a hazardous material. Specifically, you ask for confirmation that the allowance in § 172.203(e)(1) to include the words "RESIDUE: Last Contained" as part of the description on the shipping paper does not require the proper shipping name marking, provided by § 172.326(a), to be supplemented with the words "RESIDUE: Last Contained."

Your understanding is correct. You are not required to supplement the proper shipping name marking on a portable tank containing residue of a hazardous material with the words "RESIDUE: Last Contained." The requirement provided in § 172.203(e)(1) allows you to include the words "RESIDUE: Last Contained" on the shipping paper in association with the basic description of the hazardous material previously contained in the package.

I hope this information is helpful. If you have further questions, please do not hesitate to contact this office.

Sincerely,

John A. Gale  
Chief, Standards Development  
Office of Hazardous Materials Standards



Supko  
§ 172.203  
§ 172.326  
Shipping Papers  
Marking  
08-0004

17 November 2007

Office of Hazardous Materials Standards  
Pipeline and Hazardous Materials Safety  
Attn: DHM-10, US Department of Transportation  
400 7<sup>th</sup> Street SW  
Washington, DC 20590-0001

Hyundai America Shipping Agency  
7701 Las Colinas Ridge, Suite 400  
Irving, Texas 75063

re: 172.203(e)(1) and (2) - Shipping Paper Requirements  
172.326(a) - Marking of Portable Tank Requirements

Encl: (1) Picture of Portable Tank

1. Part 172.203(e)(1) addresses the requirement to supplement the shipping description on a shipping paper to include the words or phrase "Residue Last Contained" before the basic description. Part 172.336(a) addresses the requirement for a portable tank to be marked with the proper shipping name on two opposing sides.

2. Hyundai America requests clarification concerning the marking of portable tanks. Please confirm that the Proper Shipping Name marking on a portable tank does not need to be supplemented with the words "RESIDUE: LAST CONTAINED". Specifically, a portable tank being transported had previously been filled with UN3394 ORGANOMETALLIC SUBSTANCE, LIQUID, PYROPHORIC, WATER-REACTIVE (TRIETHYLALUMINUM), CLASS 4.2(4.3) PG I and only contained residue of that product. The tank was marked on two opposing sides with the PSN - ORGANOMETALLIC SUBSTANCE, LIQUID, PYROPHORIC, WATER-REACTIVE and included the chemical description (TRIETHYLALUMINUM). Enclosure (1) is a picture of the tank markings.

3. Supplementing Proper Shipping Names with the words or phrase "Residue: Last Contained" is only a shipping papers requirement and has no impact on the marking of portable tanks.

4. Please confirm if my interpretations above are correct.

Best Regards,

Herb Giles  
Manager, Hazardous Materials  
Hyundai America Shipping Agency  
972-550-2645

**HYUNDAI AMERICA SHIPPING AGENCY, INC.**

7701 LAS COLINAS RIDGE, SUITE 400, IRVING, TX 75063  
TEL: (972) 373-3100 FAX: (972) 373-3139

FORM 19200316

US 2277

3394



ORGANOMETALLIC SUBSTANCE, LIQUID  
PYROPHORIC, WATER-REACTIVE  
(TRIETHYLALUMINUM)

TAMP  
90-41-97003432  
TENT. NEAT  
MADE IN USA

CARGO FIRE LIQUID WATER  
USE DRY  
CHEMICAL EXTINGUISHER

12/12/2007