



U.S. Department  
of Transportation

Research  
and  
Special Programs  
Administration

JUL 1 1998

Mr. R. B. Wood  
Senior Traffic Officer  
Department of California Highway Patrol  
32951 Camino Capistrano  
San Juan Capistrano, CA 92675

400 Seventh Street, S.W.  
Washington, D.C. 20590

Ref. No.: 98-0119

Dear Officer Wood:

This is in response to your letter requesting clarification of a quantity description on a shipping paper and the shipping description for gasoline. I apologize for the delay in responding.

Your questions are paraphrased and answered as follows:

**Question 1. Would the term 2 steel bins be a proper total quantity description on a shipping paper for a transport vehicle carrying 2 IBC's?**

The answer is yes. Any container with a maximum capacity greater than 450L (119 gallons) as a receptacle for a liquid, or a maximum net mass greater than 400 kg (882 lbs), and a maximum capacity greater than 450L (119 gallons) as a receptacle for a solid (see § 171.8, bulk packaging) is considered to be a bulk packaging. Section 172.202 (a) (5) states that for bulk packages (e.g., IBCs), some indication of total quantity must be shown; the indication "2 steel bins" is acceptable.

**Question 2. May a shipper of gasoline insert into the shipping description octane and temperature readings after the packing group and before the total quantity?**

The answer is yes. Section 172.201 (a) (4) states that the shipping paper may contain additional information about the material provided the information is not inconsistent with the shipping description. The additional information must appear after the basic description required by § 172.202 (a) (1), (2), (3), and (4).

I trust this satisfies your inquiry. If this office can be of further assistance, please contact us.

Sincerely,

Delmer F. Billings  
Chief, Standards Development  
Office of Hazardous Materials Standards

State of California 714-661-6215

Business, Transportation and Housing Agency

32951 Camino Capistrano  
San Juan Capistrano, 92675  
ICA

**Memorandum**

Date: June 1, 1998

To: Edward Mazullo  
U S D O T RSPA

From: DEPARTMENT OF CALIFORNIA HIGHWAY PATROL  
CHP Capistrano R.B. Wood 5997

File No.: 690/5997

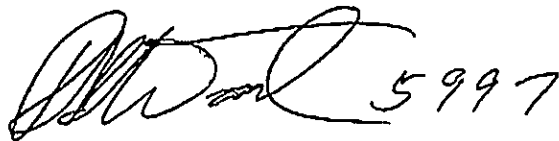
Subject: INTERPRETATION OF CFR 49 172.202A5

Dear Mr. Mazullo

Would the term 2 steel bins be a proper total quantity description on a shipping paper for a transport vehicle carrying 2 IBC's?

The second question would be, can a shipper for gasoline , insert into the shipping description octane and temperature readings, after the packing group and before the total quantity? 172.202b states that the basic description is in a(1 through 4).

Please respond as soon as possible, my Fax is 949 487 4000  
Thank you very much for your help.



R. B. Wood  
Senior Traffic Officer