



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

APR 22 1999

Mr. J. J. Quandt
BP Oil Company
200 Public Square
Cleveland, OH 44114-2375

Ref. No. 99-0039

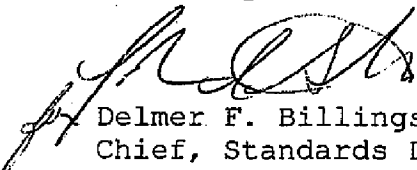
Dear Mr. Quandt:

This is in response to your letter dated February 1, 1999, regarding requirements to identify marine pollutants on shipping papers under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically you ask if you may describe leaded gasoline on a shipping paper as "Gasoline (leaded), 3, UN1203, PG II, Marine Pollutant."

The answer is yes. Section 172.203(1)(1) states that if a proper shipping name for a material that is a marine pollutant does not identify the component making it a marine pollutant, the name of that component must appear in parentheses in association with the basic description. The shipping name "Gasoline" and the description "Marine Pollutant" which appear as part of the shipping description are sufficient to identify the marine pollutant "Gasoline, leaded." It is the opinion of this Office that the description "Gasoline, (leaded), 3, UN1203, PG II, Marine Pollutant" is also an acceptable description for leaded gasoline.

I hope this satisfies your request.

Sincerely,


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



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