



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

APR 9 1999

Ms. Carrie Ramsey
Westinghouse Savannah River Site
P.O. Box 616 - Bldg. 716-2A
Aiken, SC 29808

Ref. No. 99-0069

Dear Ms. Ramsey:

This is in response to your March 8, 1999 letter concerning the use of Environmental Protection Agency (EPA) waste codes as a technical name under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if parentheses are required around the EPA waste code for the proper shipping description "RQ, Hazardous Waste, Solid, n.o.s., 9, NA3077, III, D009."

Parentheses are required to surround the name of the hazardous substance as required by § 172.203(c). In your example, the EPA waste code identifies a hazardous substance, thus, it needs to be in parentheses.

I hope this satisfies your request.

Sincerely,

John A. Gale
Transportation Regulations Specialist
Office of Hazardous Materials Standards



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172.202

BAH

DATE: 3/8/99

5172.203

99-0069

FROM:

CARRIE RAMSEY (Shipper)
Westinghouse Savannah River Site
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ATTENTION: EDWARD T. MAZZULLO
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US DOT/RSPA
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SUBJECT: CLARIFICATION TO 49 CFR 172.2.03(k)(4)(i)

To ensure accuracy could you please provide interpretation per 49 CFR 172.203(k)(4)(i), should you have a material that is a hazardous waste and described using the proper shipping name "Hazardous Waste, Liquid or Solid, n.o.s.", classed as miscellaneous Class 9. provided that the EPA hazardous waste number is included on the shipping paper in association with the basic description and are the parenthesis required?

EXAMPLE: RQ, Hazardous Waste, Solid, n.o.s., 9, NA3077, III, D009

Please forward reply to the above address or you can reach me via FAX at 803-725-9852.

THANKS IN ADVANCED

Carrie Ramsey