



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

AUG 6 1999

Ref. No. 99-0181

Mr. Bob Burnett
General Services Administration
Bldg. 412-A
Rough & Ready Island
Stockton, CA 95203

Dear Mr. Burnett:

This is in response to your letter dated June 29, 1999, requesting clarification of a proper shipping description under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you asked if it was permissible for a coating kit containing two receptacles of coating solution, one classified as packing group (PG) II and the other classified as PG III, to be described under one shipping description as a PG II material.

The answer is no. A Class 3, PG III material may not be described on a shipping paper as a PG II material. In the scenario you describe, the PG II and PG III coating solution should be described separately on your shipping paper.

I hope this satisfies your request.

Sincerely,

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



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172.202



WESTERN DISTRIBUTION CENTER BLDG. 412
ROUGH AND READY ISLAND
STOCKTON, CA 95203

BIDH
§ 172.202
99-0181

June 29, 1999

TO: Hazardous Materials, D.O.T.

FROM: Bob Burnett
General Services Administration
Bldg 412-A
Rough & Ready Island
Stockton Ca 95203

SUBJECT: Description of hazardous materials

We have a coating kit being shipped to us that contains
Paint, 3, UN1263 with equal quantities (3.8L) of packing
group II and III.

They have chosen to describe this material as 7.6 L of packing
group II and ignore the group III.

Is this permissible to describe as such, or must each be
considered a Proper Shipping Name?

Your help is greatly appreciated