



U.S. Department  
of Transportation

**Research and  
Special Programs  
Administration**

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

**JUN 5 2000**

Ms. Darlene Rauk  
Midwest Rubber Mfg., Inc.  
P. O. Box 207  
250 Industrial Circle  
Stoughton, WI 53589

Ref. No. 00-0144

Dear Ms. Rauk:

This is in response to your letter dated May 5, 2000 requesting verification on the proper shipping of Adhesives, 3, UN 1133, PG II. You ask if it is possible to ship 8 oz. cans in a case of 24, weighing 13 lbs. per case, without labeling the cans. You further state that the case would be palletized and shrink-wrapped.

The labeling requirements found in 49 CFR 172.400 require each non-bulk package (i.e., case) to be labeled with the label specified in the § 172.101 Table for the material. In your situation, the hazard warning labels are only required on the outside package and are not required to be placed on inner packages (i.e., cans). If several cases are shrink-wrapped, and the labels on the packages are not visible, the label and other markings must be placed on the shrink-wrapped film overpack. See § 173.25.

I hope his information is helpful.

Sincerely,

Hattie L. Mitchell  
Chief, Regulatory Review and Reinvention  
Office of Hazardous Materials Standards



000144

172.400



**MIDWEST RUBBER MFG., INC.**  
P.O. BOX 207, STOUGHTON, WISCONSIN 53589  
PHONE 608/873-7788 FAX 608/873-5880

Corbin  
\$ 172.400  
00-0144

May 5, 2000

Attn: Edward Mazzullo (fax - 202-366-3012)  
Department of Transportation  
Hazardous Material Dept

From: Darlene Rauk (fax - 608-873-5880)  
Midwest Rubber Mfg., Inc  
P O Box 207 - 250 Industrial Circle  
Stoughton, WI 53589

Pages: 1

Regarding: Labeling of shipping hazardous materials

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Dear Mr. Mazzullo:

I was informed to contact you for verification on the proper shipping of the following. ADHESIVES, 3, UN 1133, PG II.

We have a customer who has requested if it is possible to ship, 8 oz cans in a case of 24, 13 pounds per case, without labeling the cans. They would like to label them when they come to them. We would label the outside of the case with all the specified labels, the case would be put on a pallet with a possibility of non-hazardous products. We stretch wrap the pallet with extra cardboard and more stretch wrap and labels will also be put on the outside of this.

I called your department and was told this could be done in accordance with the section 172.400. I would like a written verification of this as soon as possible. Thank you.

Sincerely,

Darlene Rauk

OHIO OFFICE: P.O. Box 5393 Fairlawn, OH 44334 Phone: (330) 867-6262