



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

AUG 27 2001

Capt. Sam Rogers
National Cargo Bureau Inc.
90 West Street, Suite 2000
New York, NY 10006-1039

Ref. No. 01-0179

Dear Capt. Rogers:

This is in response to your letter dated July 11, 2001, requesting clarification of marking requirements for bulk packages in the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if a bulk package containing a hazardous material subject to § 172.203(k) must be marked with the technical name as specified in § 172.301(b) for a non-bulk package.

The answer is no. There is no requirement in the HMR to mark a technical name on a bulk package containing a hazardous material subject to § 172.203(k).

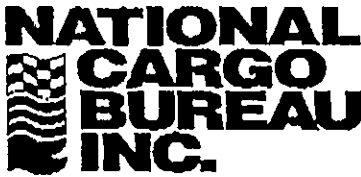
I hope this satisfies your request

Sincerely,



John A. Gale

Transportation Regulation Specialist
Office of Hazardous Material Standards



Bulk
 §172.302(d) TEL. (212) 571-5000
 FAX (212) 571-5005
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Facsimile Letter Requesting Interpretation

*Marking Bulk
 Packagings
 01-0179*

Mr. Edward Mazzullo
 Department of Transportation, RSPA
 Office of Hazardous Materials Standards (DHM-10)
 Washington, DC 20590-0001

Subject: Package Markings for other than Non-Bulk Packaging when declared
 under Generic or NOS Proper Shipping Names

References: 49CFR, 172.302(d), 172.326(a)

Dear Mr. Mazzullo,

A recurring situation exists pertaining to the marking requirements for large and bulk package, which warrants clarification. Within section 172.301 there is the expressed general marking requirements for non-bulk packagings. Paragraph (b) of this section addresses technical name requirements in association with the proper shipping name. As such, technical names where indicated by the symbol "G" in column 1 of the Hazmat Table, will require be a required marking on non-bulk packagings.

In review of the bulk package marking requirements relating to this same issue, are non-existent. We feel that this may have been an oversight, in that materials loaded in intermediate, large and bulk packagings pose greater risk than those in non-bulk packagings; and would also require the same package markings.

Do the packages other than non-bulk, require the technical name(s) on the exterior of these, as part of the proper shipping name?

Please provide us with your interpretation in order to avoid any confusion with the Internationally accepted methods/recommendations.

Best regards,

A handwritten signature in black ink that reads "Sam Rogers".

Capt. Sam Rogers
 Master Mariner
 Senior Hazmat Coordinator