



U.S. Department  
of Transportation  
**Research and  
Special Programs  
Administration**

DEC 27 2001

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

Ms. Mary Beth Schommer  
UPS Corporate Hazardous  
Materials Manager  
55 Glenlake Parkway NE  
Atlanta, GA 30328

Ref. No. 01-0316

Dear Ms. Schommer:

This is in response to your letter dated December 18, 2001 requesting a review of your proposed shipping labels for compliance with the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if the incorporation of the ORM-D markings into the UPS bar coded address label will meet the marking requirements under the HMR. You provided three examples of UPS bar coded address labels containing the ORM-D markings.

The answer is yes. Section 172.304(a)(4) states that the required marking (proper shipping name and identification number) must be located away from any other marking (such as advertising) that could substantially reduce its effectiveness. The required markings appearing on your enclosed labels are readily distinguishable and satisfy this requirement.

I hope this satisfies your request.

Sincerely,

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



010316

172.304



United Parcel Service 55 Glenlake Parkway, NE  
Atlanta, GA 30328  
(404) 828-6000

Date: December 17, 2001  
To: Arthur Pollak - Office of Hazardous Materials Standards  
From: Mary Beth Schommer - UPS Hazardous Materials Manager  
Subj: UPS Label Mock-up Containing ORM-D Ground Markings

UPS has been asked about the possibility of incorporating the ORM-D marking for ground packages into the bar coded address label that is applied to each shipment, thus eliminating the need to put separate markings on the package. Following are three mock up examples containing the consumer commodity markings on a UPS address and tracking label meeting our internal specifications.

As there are two different sizes of address and tracking labels that are acceptable in our system, there are a couple of versions containing the ORM-D marking. The two 4" X 8" samples (#1 and #2) were submitted for approval in the past month, and were given verbal approval by Del Billings as being an acceptable option for a shipper to mark the consumer commodity regulatory information on a package. Sample #3 is a new example of the 4" X 6" label, whereas the previous two versions submitted for approval were not acceptable due to the close proximity of non-regulatory information, thus reducing the effectiveness of the markings.

Based on the three current samples submitted, does D.O.T. feel the ORM-D marking requirement in 172.304 is being met, and the effectiveness of the markings haven't been reduced? Your thoughts and comments are much appreciated. Contact me with any questions, concerns or input you may have on this matter. A written reply is requested in order for us to incorporate approved specifications into our internal label requirements.

Regards,

*Mary Beth Schommer*

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