



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

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

JUL 3 2002

Mr. Dana Probasco
Haz-Mat Specialist
R+L Carriers
P.O. Box 271
Wilmington, OH 45177-0271

Ref. No.: 02-0103

Dear Mr. Probasco:

This is in response to your March 26, 2002 letter regarding the appropriate placement of "Marine Pollutant" and the chemical name of the Marine Pollutant on shipping papers under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). In particular you asked for clarification on where the wording "Marine Pollutant" and "Marine Pollution Component (MP Component)" should be located "in association with the basic description."

Section 172.203(l)(1) states that if the proper shipping name for a material which is a marine pollutant does not identify by name the component which makes the material a marine pollutant, the name of that component must appear in parentheses in association with the basic description.

In addition, as required in §172.203(l)(2) the words "Marine Pollutant" shall be entered in association with the basic description for a material which is a marine pollutant. Examples of acceptable shipping descriptions are:

Resin solution, 3, UN1866, PG III, Marine Pollutant (MP Component)

Resin solution (MP Component), 3, UN1866, PG III, Marine Pollutant

For you information, section 171.4 (c) states, that except when transported aboard vessel, the requirements of this subchapter specific to marine pollutants do not apply to non-bulk packaging transported by motor vehicles, rail cars or aircraft.

I hope this information is helpful. Please contact us if you require additional assistance.

Sincerely,

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

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Relferford
§ 172.203(I)
Shipping Papers
02-0103

Attention: Haz-Mat Info Center

From: Dana Probasco (Haz-Mat Specialist) Safety Department

Phone: (937) 382 - 1494

Fax: (937) 382 - 2677

Date: 3/26/02

Re: Request for Letter of Interpretation regarding descriptions of Marine Pollutant's on shipping papers.

To Whom It May Concern:

I am requesting a Letter of Interpretation regarding the placement of the word's Marine Pollutant and the Chemical Name of the Marine Pollutant on shipping papers.

The regulations 49CFR 172.203(I) is not clear regarding the 'placement in association with the basic description'.

Example: Which would be correct?

Resin solution, 3, UN1866, PGIII. Marine Pollutant (Vinyl Pollution 40%).

or

Resin solution, Marine Pollutant (Vinyl Pollution 40%),
3, UN1866, PGIII.

or

Resin solution, 3, UN1866, PGIII. (Vinyl Pollution 40%), Marine Pollutant.

Thank you,

Dana Probasco
Haz-Mat Specialist

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