



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

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

OCT 16 2002

Roland M. Kelley
Packaging Consultant
Sandia National Laboratories
P.O. Box 5800, MS 1120
Albuquerque, NM 87185

Ref No. 02-0238

Dear Mr. Kelley:

This is in response to your September 3, 2002 letter, requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to marking requirements on the side of steel drums. Specifically, you question the current validity of Interpretation letter dated August 23, 1993 and addressed to Evans Industries, Inc. stating that the United Nations symbol is required for any additional replication of markings other than embossed.

As provided in § 178.503, a packaging conforming to a UN standard must be marked with the United Nations symbol as illustrated in paragraph (e)(1) of this section. The letters, "UN" may be applied in place of the symbol for embossed metal receptacles. Any additional replication of the required UN marking through other means (e.g. silk screening or stenciling) must include the UN symbol rather than the letters "UN".

I hope this information is helpful. If we can be of further assistance, do not hesitate to contact us.

Sincerely,

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



020238

178.503



Sandia National Laboratories

Operated for the U.S. Department of Energy by
Sandia Corporation

Albuquerque, New Mexico 87185-1453

Sandia National Laboratories
PO Box 5800, MS 1120
Albuquerque, NM 87185

September 3, 2002

Ms. Sandra Webb, Transportation Reg. Specialist
DHM -11
U. S. Department of Transportation
Research and Special Programs Administration
Office of Hazardous Materials Standards
400 Seventh Street SW
Washington, D.C. 20590

RE: Interpretation of 178.503 (a) (1)

Dear Ms. Webb:

On August 28 and 29, 2002, I spoke to you and Mr. Arthur Pollack, on separate occasions by phone requesting clarification of 178.503 in reference to the additional marking requirement on the sides of steel drums. The interpretation letter dated August 23, 1993, and addressed to Evans Industries, Inc., (07238.pdf) stated that the UN symbol is required for any additional replication of markings other than embossed. During our discussions it was confirmed that the clarification is still valid and that the regulations still require that "Any additional replication of the required UN marking through other means (e.g. silk screening or stenciling) must include the UN symbol rather than the letters "UN".

At this time Sandia National Laboratories requests confirmation in writing that the interpretation letter dated August 23, 1993, and addressed to Evans Industries, Inc., is still valid and binding.

Thank you for your quick responses in this matter. Should you have any further questions please contact me at 850-547-2122 or 505-845-7337.

Sincerely,


Roland M. Kelley
Packaging Consultant

Attachment

Exceptional Service in the National Interest

Foster
§ 178.503.(a)(1)
Marking
02-0238