



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

NOV - 8 2002

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

Ref. No. 02-0265

Dear Mr. Kelley:

This is in response to your facsimile dated October 1, 2002, and subsequent telephone conversation with Sandra Webb, of my staff, requesting clarification of the Hazardous Materials Regulations (HMR, 49 CFR Parts 171-180). Specifically, you asked whether the "UN" symbol you submitted for our review is acceptable as a marking on a UN standard packaging. We apologize for any misinformation you received from this office.

The markings as shown on the examples, enclosed with your letter, do not conform with the requirements in § 178.503. As provided in § 178.503, a packaging which meets the UN standard and has been tested in accordance with Subpart L of Part 178, of the HMR, must be marked with the UN symbol as illustrated in 49 CFR § 178.503(e)(1). The example symbol you submitted is not displayed in a solid circle as illustrated in § 178.503(e)(1), thus not acceptable.

I hope this information is helpful.

Sincerely,

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



020265

178.503

**Sandia National Laboratories**Operated for the U.S. Department of Energy by
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PO Box 5800, MS 1120
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October 1, 2002

Mr. Edward T. Mazzullo, Director
DHM -10
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 (e) (1)

Dear Mr. Mazzullo:

On October 1, 2002, I spoke with your organization by phone about Title 49 Part 178.503 (e)(1) stating, "The following are examples of symbols and required markings:" and shows an example of a circle (solid line not broken) with the letters "u" and "n" located inside the circle. As the regulation reads the circle must appear as shown (solid line). The question is based on the fact that stenciling is a very common way of marking in industry and requires bridges thru the solid lines to hold the letters inside the circle. Two examples of "un" symbols currently in use today were sent and reviewed by your office. The decision was that the two examples were acceptable. We have attached the two examples of "un" symbols currently in use today that were reviewed by your office.

At this time Sandia National Laboratories requests the confirmation of your verbal interpretation in writing. Thank you for your quick responses in this matter. Should you have any further questions please contact me at 505-845-7337.

Sincerely,

Roland M. Kelley
Packaging Consultant

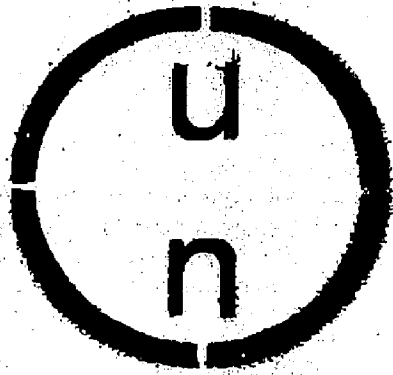
Attachment

Exceptional Service in the National Interest

Webb
§ 178.503 (e) (1)
Marking
02 - 0265



Example #1



Example #2