



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

NOV 23 1998

Arthur P. Hancock
42 Gorse Road
Cookham, Berks SL6 9LL
England

Ref. No.02-0285

Dear Mr. Hancock:

This is in response to your facsimile of November 16, 1998, concerning a new requirement for limited quantities of dangerous goods introduced into the European road and rail regulations for transporting dangerous goods (ADR/RID). The new requirements (e.g., marginal 2301a of the ADR), which become effective on January 1, 1999, are for a diamond shaped label to appear on packages of limited quantities of dangerous goods. The label is to bear the United Nations number of the item of dangerous goods contained in the package or the letters "LQ" when more than one item of dangerous goods is in the package. You asked whether packages so labeled would be acceptable for transport in the United States.

We consider packages so labeled to be unacceptable for transport in the United States. The US Hazardous Materials Regulations (HMR) in Title 49 of the Code of Federal Regulations in 172.401(b) prohibits labeling "which by its color, design, or shape could be confused with a label prescribed" by the HMR. In our opinion, the labeling required by the new ADR/RID requirements could be so confused. Therefore, such labeling is prohibited from use in the United States.

Sincerely,

Frits Wybenga,
International Standards Coordinator
for Hazardous Materials Safety



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FAX

From: Arthur Hancock **Phone/fax** 01628 526153
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on behalf of AISE

To: Mr. F. Wybenga **Fax:** 00 1 202 366 5713
US Dept. of Transportation

Date: 16th November 1998 **Number of pages (inclusive)** ONE

Subject: Dangerous Goods in Limited Quantities


As you are aware, RID/AJR have introduced a requirement that packages containing Limited Quantities must be marked with the UN Number(s) in a diamond shaped outline measuring 100mm x 100mm.

According to my assessment and advice given by UK competent authorities there is no objection to this marking method for goods shipped by sea or air.

However, I am informed by a shipper to the USA that he has been told that such a marking would not be permitted for goods distributed with the USA. If this is true then industry is faced with having to change package markings according to the final distribution which is one of the problems AISE wishes to overcome in reviewing UN Chapter 3.4.

Could you please let me have your advice about this.

Yours sincerely,


A.P. Hancock

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