



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

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

FEB 28 2003

Mr. Marc Caron
Packaging/Sales Engineer
Specialty Industries
175 East Walnut St.
Red Lion, PA 17356

Reference No. 03-0046

Dear Mr. Caron:

This is in response to your letter concerning the placement of UN markings displayed on a 4G fiberboard box under § 178.503 of the Hazardous Materials Regulations (49 CFR Parts 171-180). Specifically, you ask whether the placement of the markings, applied in a single line but with the year of manufacture offsetted and placed to the right of the other markings, is acceptable. Additionally, you ask if the markings are not acceptable could a custom label bearing the required markings in a single line as illustrated in be used to cover the incorrect markings. You enclosed a photograph of the marked packaging for our review.

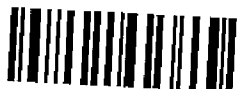
Your packaging markings, as represented on the photograph, does not satisfy the marking requirements in § 178.503 as placement of the year of manufacturer is confusing and is not readily associated with the other markings. You may use a custom label bearing the required markings as you suggest, or cover or obliterate the printed year of manufacture and re-mark the year of manufacture next to and in alignment with the other markings as shown in § 178.503(e)(2).

I hope this satisfies your request.

Sincerely,

Hattie L. Mitchell, Chief
Regulatory Review and Reinvention
Office of Hazardous Materials Standards

Enclosure



030046

178 503

Marc Caron
Packaging/Sales Engineer
Specialty Industries
175 East Walnut St.
Red Lion, PA 17356

Edward T. Mazzullo
Director, Office of Hazardous Materials Standards
USDOT/RSPA (DHM-10)
400 7th Street SW
Washington, DC 20590-0001

Dear Mr. Mazzullo:

This letter comes to you after having spoken to a representative in the Hazardous Materials Information Center. I am a packaging/sales engineer, employed by a small corrugated box manufacturer in Central Pennsylvania. We are required by a few of our customers to include the UN Designation (UN 4G/Y**/S*) [per 49 CFR] markings on our boxes. Specifically, the specification marking requirements for non-bulk performance oriented packagings found in § 178.503 of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180).

A recent complaint has come across the desk of our Quality Coordinator. The complaint is in reference to the year of manufacture (* = the last two digits of the calendar year) marking. The marking is on the box as required, but "offset" to the right, for lack of a better word, and not in line with the rest of the required markings. (Please see attached photo.)

In speaking to your representative, I have asked two questions:

- 1) As seen in the picture, are the current markings (particularly the year of manufacture, in this case 03) acceptable?
- 2) If the markings are not acceptable, is a custom label with all required markings placed over the area you see in the picture an acceptable alternative?

I've been told that although all the required information and markings are present on the box, the year of manufacture marking may cause confusion or rejection by an inspector. With that said, I have been told the use of permanent self-adhesive markings, containing the specification markings that comply with § 178.3, are authorized.

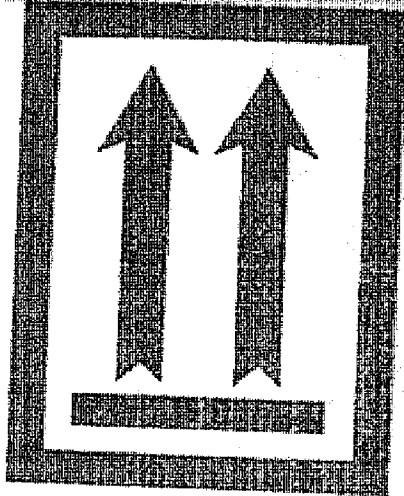
We do not want to scrap the rejected order. Instead, I am requesting a formal written response to my questions above. It is our intention to use this written response detailing alternatives to the current markings should they be deemed unacceptable (i.e. a permanent self-adhesive with all required markings) as a rebuttal to our customer's rejection of the product.

I want to thank-you in advance for taking the time to answer my request. Should you need further assistance or having any questions, I can be reached at the numbers listed below.

Sincerely,

Marc Caron
Specialty Industries
Packaging/Sales Engineer
Office: 717-246-1661
Cell: 717-880-6311
Email: macron@specialtyindustries.com

Befts
§ 178.3
§ 178.503
Marking of
Packagings
03-0046



4G/Y24/S/ 03
USA/HEDWIN
BALTIMORE, MD 21211