



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

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

MAR 24 2004

Lisa Stone  
"K" Line America, Inc.  
8730 Stony Point Parkway, Suite 300  
Richmond, VA 23235

Ref. No. 04-0006

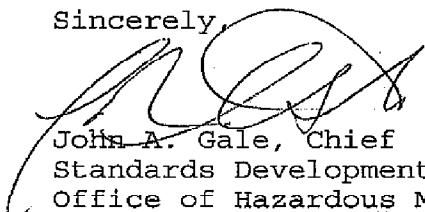
Dear Ms. Stone:

This is in response to your letter dated January 8, 2004, regarding the requirement to indicate the number and type of packages on shipping papers in accordance with the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically you ask whether you may describe your intermediate bulk container as "Super Sack" on a shipping paper.

The answer is yes. Section 172.202(a)(6) specifies that the number and type of packages must be indicated. The type of packages may be indicated by the description and by packaging specification number when applicable.

I hope this satisfies your request.

Sincerely,

  
John A. Gale, Chief  
Standards Development  
Office of Hazardous Materials Standards



040006

172.202(a)(6)

Request for Letter of Interpretation

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**INFOCNR**

BAH  
§172.202(a)(6)

**From:** Stone, Lisa (KAM.RIC)  
**Sent:** Thursday, January 08, 2004 3:15 PM  
**To:** INFOCNR  
**Subject:** Request for Letter of Interpretation

Shipping Papers  
04-0006

It would be greatly appreciated if a letter of interpretation could be sent to clarify the following issue:

Would the phrase "Super Sack" be an acceptable package description on a shipping paper since "Super Sack" it is not described specifically in IMDG Amendment 31, Part 4, nor 49CFR - Part 178? Or would the description be more appropriate as Flexible IBC or IBC08?

UN specifications: 1.3H1

Thank you for your clarification in this matter.

Best Regards  
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1/9/04