



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

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

OCT 14 2004

Ms. Felicia L. Lynch
Lonza, Inc.
17-17 Route 208
Fair Lawn, NJ 07410

Ref. No. 04-0184

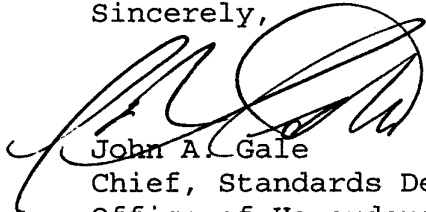
Dear Ms. Lynch:

This is in response to your August 6, 2004 letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if a shipper must re-mark the consignor address on packages that were preprinted with an address that is no longer a valid address for the shipper.

Under § 172.301(d) a non-bulk package must be marked with the consignor or consignee's name and address. The address must be a valid and current address of the consignor or consignee.

I hope this information is helpful. If you have further questions, please do not hesitate to contact this office.

Sincerely,



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



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172.301(d)

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§ 172.301(d)
marking
04-0184

Lonza

Office of Hazardous Materials Standards Research and Special
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DMH-10 U.S Department of Transportation

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6 August 2004

Interpretation of 49 CFR Section 172.301(d)

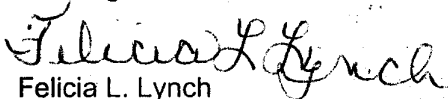
To Whom It May Concern:

I am writing to request an interpretation regarding 49 CFR section 172.301(d). Our company is moving its headquarters and consolidating locations beginning this month. We expect to complete the move by September 2004. All product labels printed going forward will include the new company address pursuant to section 301(d). However, we currently have a large quantity of product stocked in warehouses for shipment. This inventory is marked with the current (soon to be old) company address. We estimate that it will take several months for us to clear this inventory. Re-labeling all inventories to note the new company address would be very expensive and labor-intensive. Our warehoused material is labeled in accordance with all applicable DOT regulations. Therefore, we request that after the company's relocation we can continue to ship our inventory without re-labeling until existing stocks are depleted.

Please note that the company name and 24-hour emergency contact phone numbers will remain the same after the relocation. Additionally, there is a procedure in place to forward all mail and telephone calls to the new address for several months after the move, and we are still located in the same state. Thus, anyone attempting to contact the company based on the address on the label would be able to do so.

Please let us know as soon as possible, whether we can continue to ship the existing inventory after the relocation, and if so, for how long. Thank you for your prompt attention to this matter.

Best regards


Felicia L. Lynch
Product Safety Manager
Lonza Inc.