



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

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

JUN 16 2006

Mr. Steven T. Webb
U.S. Coast Guard CITAT
6500 South Macarthur Boulevard
Oklahoma City, OK 73169

Reference No. 06-0022

Dear Mr. Webb:

This is in response to your request for a clarification of the marking requirements for limited quantities prescribed in § 172.315 of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). We have paraphrased your questions and answered them in the order provided. We apologize for the delay in responding and any inconvenience this may have caused.

- Q1. Is the marking the International Maritime Dangerous Goods Code (IMDG) requires for limited quantity shipments under Section 3.4.5.1.2, i.e., the UN identification number for the material in a white square-on-point diamond, unless excepted under Section 3.4.7, the same as that required for limited quantity shipments under § 172.315 of the HMR?
- A1. Yes. As specified in § 172.315, except for transportation by aircraft, marking the package with the identification number inside a white square-on-point configuration identifies the material as a limited quantity and fulfills the requirements of § 172.301(a)(1). If a shipper uses this method to identify packages containing limited quantities, the shipper is not required to mark the proper shipping name, technical name, hazardous substance name(s) or "RQ" on the outer package.
- Q2. If the shipper marks the package with the proper shipping name and UN identification number, is the shipper also required to mark the package with the UN identification within the white square-on-point diamond?



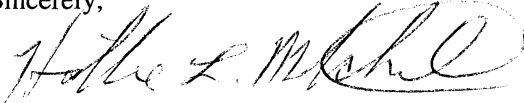
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172.315

- A2. No. If a shipper does not use the UN identification within the “white square-on-point diamond” exception, the outer package for a limited quantity must comply with marking requirements for non-bulk packages prescribed in § 172.301, and other applicable requirements in 49 CFR Part 172, Subpart D, for the hazard class(es) contained within the package.

I hope this information is helpful.

Sincerely,

A handwritten signature in cursive script, appearing to read "Hattie L. Mitchell". The signature is written in black ink and is positioned above the typed name.

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

Nickels, Matthew <PHMSA>

From: Steven.T.Webb@USCG.MIL
Sent: Monday, January 30, 2006 4:26 PM
To: INFOCNTR <PHMSA>
Subject: Information Center Comments/Questions

Edmonson
§172.315

markings
06-0022

Below is the result of your feedback form. It was submitted by Steven Webb (Steven.T.Webb@USCG.MIL) on Monday, January 30, 2006 at 16:26:29.

Email: Steven.T.Webb@USCG.MIL

Name: Steven Webb

Category: Hazardous Materials Table, Special Provisions, Hazardous Materials Communications

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Comments: Dir Sir or Madam,

I am writing today to get an interpretation of 49 CFR 172.315 marking requirements for packages containing limited quantities. I am having trouble determining the intent of 172.315 and am hoping to get some clarification.

I interpret 49CFR 172.315 to read that if a package containing limited quantities is marked with the letters UN and the proper Id number in a diamond that meets the requirements of 172.315(a) that the shipper does not have to mark the proper shipping name. One of my questions arises here. Assuming that the prior statement is correct, is the shipper required to put the UN number in a diamond on a package being shipped as a limited quantity. I see that they are excepted from marking the shipping name if they have the diamond, but no where in 49 does it say that if they mark the package with proper shipping name and ID number that they are excepted from the marking of the UN number in the diamond.

Basically I pose two questions:

1. Is the marking that IMDG 3.4.5.1.2 (UN **** in a diamond) requires for limited quantity shipments that aren't excepted by 3.4.7 of IMDG, required on limited quantity shipments prepared under 49CFR.
2. If the shipper using 49CFR marks a package with the UN **** and proper shipping name do they not have to mark the UN**** in a diamond.

Your help in this matter is appreciated. I work for the United States Coast Guard Container Inspection Training and Assistance Team, and need clarification for our students as well as for enforcement applications. I have already talked to your help desk about this issue, but would like a letter of interpretation to refer students and colleagues.

Thanks in advance for your help

MST3 Steven Webb
United States Coast Guard
Container Inspection Training and Assistance Team