



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety Administration**

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

SEP 18 2006

Mr. Paul Lezak
Schlumberger, Ltd.
14910 Airline Road
Rosharon, TX 77583

Ref. No.: 06-0173

Dear Mr. Lezak:

This is in response to your August 3, 2006, letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask whether overpacks containing explosive materials need to be marked with appropriate EX-numbers.

The HMR do not require the marking of EX-numbers on overpacks. Section 173.25 requires each overpack to be marked with the proper shipping names and identification numbers required under the HMR for each hazardous material contained within the overpack, unless those markings are visible. The other marking requirements in § 173.25 are conditional marking requirements that are unrelated to EX-number markings and are irrelevant to this scenario. Therefore, dual marking of the EX-numbers on both the packages and overpacks is not required. However, to avoid the possible frustration of your shipment you may include on the shipping paper, in association with the shipping description, the EX-number, product code, or national stock number of each explosive item described under a proper shipping description.

I hope this satisfies your request.

Sincerely,

Charles E. Betts
Senior Transportation Specialist
Office of Hazardous Materials Standards



060173

173.25

Jarman, Erin <PHMSA>

From: lezak@slb.com
Sent: Thursday, August 03, 2006 10:53 AM
To: INFOCNTR <PHMSA>
Subject: Information Center Comments/Questions

BAH
\$173.25
\$173.320

Below is the result of your feedback form. It was submitted by Paul Lezak (lezak@slb.com) on Thursday, August 3, 2006 at 10:53:10.

OVERPACK
06-0173

Email: lezak@slb.com

Name: Paul Lezak

Category: Shippers-General Requirements for Shipments and Packagings (Sections 173.1 - 173.476)

Organization: Schlumberger

Street: 14910 Airline Road

City: Rosharon

State: Texas

Zip Code: 77583

Phone: 281-285-5676

Fax: 281-285-5477

Comments: Dear Mr. Edward T. Mazzullo,

I need to know if an overpack containing explosive materials is required to be marked with the EX-Numbers of the explosive packages contained inside the overpack. Section 173.25(a)(2) requires the outside of the overpack to be marked with the P'SN's, ID number's and proper labels.

Section 172.320 explains how the outside of a package containing explosive materials must list the EX-number, product code, or national stock number.

I contacted the DOT toll free number and requested guidance regarding this question. The individual intially stated the EX-number should be marked on the outside of an overpack, and if more than 5 packages containing EX-numbers are contained inside the overpack, at least 5 EX-numbers should be listed on the overpack. I was then placed on hold while the individual investigated if he could find a definitive ruling on this topic. A few minutes later the individual communicated that he found some evidence that the EX-number did not have to be on the outside of an overpack, but he could not provide me the document. His opinion was that we should place EX-numbers on the outside of an overpack. He also recommended I send your office an email requesting guidance. Please advise.

Best regards,
Paul Lezak