



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

MAY 23 2008

1200 New Jersey Avenue, SE
Washington, D.C. 20590

Mr. Kelly V. Camp
Woodard and Curran, Inc.
95 Cedar Street, Suite 100
Providence, RI 02903

Ref. No. 08-0092

Dear Mr. Camp:

This is in response to your request for clarification of the marking requirements under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) for packages containing limited quantities. Specifically, you request confirmation of your understanding that technical names are not required to be marked on packages containing limited quantities if they are marked in accordance with § 172.315.

As specified in § 172.315, except for transportation by aircraft or if otherwise stated in the HMR, marking the package with the identification number inside a white square on-point configuration identifies the material as a limited quantity and fulfills the general marking requirements in § 172.301(a)(1). If you use this option to identify a package containing a limited quantity, you are not required to mark the shipping name or technical name on the package. If you choose to mark the package with the shipping name, then a technical name may be added, but, provided the requirements of § 172.315 are met, the technical name is not required.

I hope this information is helpful. Please contact this office should you have additional questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Hattie L. Mitchell", with a long horizontal line extending to the right.

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

**COMMITMENT & INTEGRITY
DRIVE RESULTS**

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McIntyre
§172.101
§172.315
Marking
08-0092

March 25, 2008



Office of Hazardous Materials Standards
Pipeline and Hazardous Materials Safety Administration
Attn: PHH-10
U.S. Department of Transportation
East Building
1200 New Jersey Avenue, SE.
Washington, DC 20590-0001.

RE: Questions About Marking, 49 C.F.R. 172.315

49 C.F.R. 172.315 states that limited quantities do not have to be marked with the proper shipping name if marked in accordance with this section. Since technical names are marked in association with the proper shipping name, please confirm that technical names are not required when limited quantities are marked in accordance with 49 C.F.R. 172.315.

Thank you for your help in addressing these questions. I can be reached at 401.273.1007 ext 2009 if you need clarification.

Sincerely,

WOODARD & CURRAN INC.


Kelly V. Camp CHMM
Senior Project Manager

KVC/cc