



U.S. Department of Transportation
**Pipeline and Hazardous Materials
Safety Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

APR 02 2015

Mr. Maurice C. Carson
Hazardous Materials Transportation Specialist
The Clorox Company
1000 Cobb Place Boulevard NW, Suite 100
Kennesaw, GA 30144

Reference No. 14-0195

Dear Mr. Carson:

This is in response to your recent letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180), and your October 14, 2014, conversation with a member of our Hazardous Materials Information Center staff, applicable to the limited quantity marking prescribed in § 172.315.

In your letter, you state that your company places bleach products in packages that comply with § 173.156 on a pallet, and then surrounds these packages in a shrink-wrap overpack. You also state your company places the § 172.315 limited quantity marking only on the outer surface of the shrink wrap. Further, you state your company was cited for not placing the limited quantity mark on each package that complied with § 173.156. You ask if the HMR require this mark to be placed on the outer surface of each limited quantity package that is transported internationally by vessel.

For those bleach products that meet the definition of a hazardous material and comply with the HMR's limited quantity regulations, the answer is yes. The HMR require markings prescribed in 49 CFR Part 172, Subpart D, which includes the § 172.315 limited quantity marking, to be printed on or affixed to the surface of a completed package that contains a hazardous material (see § 172.304(a)(1)). In your example, the completed package is the box of hazardous material bleach products that complies with § 173.156, and the overpack is the shrink wrap (see the definitions for "package" and "overpack" in § 171.8). If the markings the HMR require are visible through the shrink wrap, they are not required to be repeated on the outer surface of the overpack (see § 173.25(a)(2)).

I hope this satisfies your request.

Sincerely,

A handwritten signature in cursive script that reads "T. Glenn Foster".

T. Glenn Foster
Chief, Regulatory Review and Reinvention Branch
Standards and Rulemaking Division

Edmonson
§ 173.156
limited quantity
14-0195

Dodd, Alice (PHMSA)

From: Ciccarone, Michael CTR (PHMSA)
Sent: Tuesday, October 14, 2014 4:07 PM
To: Hazmat Interps
Subject: FW: Letter of Interpretation

Shante and Alice,

Please submit this for a formal letter of interpretation. Mr. Carson spoke with Adam Lucas in the HMIC.

Thanks,

Mike

From: Maurice Carson [<mailto:Maurice.Carson@clorox.com>]
Sent: Tuesday, October 14, 2014 12:49 PM
To: INFOCNTR (PHMSA)
Subject: Letter of Interpretation

Good day,

I am requesting an official Letter of Interpretation for the following Limited Qty Ruling.(173.156) The Clorox Services Company has been shipping Bleach products for years internationally, without any incidents. Recently one of our containers was sent back to a distribution center to have each BOX(772) individually labeled with the New Limited Qty Marking. This was done at a considerable cost as you might imagine. We have always Palletized, Shrink-wrapped and placed on one side the Limited Qty marking and also the wording OVERPACK.(173.25 a) This has been done, to the lack of visibility of each box. Your timely help with the clarification of this will be greatly appreciated. Thank you.

Maurice C. Carson
Hazardous Material Transportation Specialist
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Support A Soldier

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