



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

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

DEC 08 2015

Patricia M. Sobel
Regulatory Manager
COSMO International Corporation
601 Fairway Drive
Deerfield Beach, FL 33441

Ref. No. 15-0180

Dear Ms. Sobel:

This responds to your letter of August 8, 2015 and subsequent telephone conversation with a member of my staff requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) and the International Maritime Dangerous Goods (IMDG) Code applicable to United Nations (UN) identification number (ID) markings for export shipments. With your request, you provided a shipping paper that indicates the shipment contained a variety of material identified as "UN3082, Environmentally hazardous substance, liquid, n.o.s.," as well as a material identified as "UN1760, Corrosive liquid, n.o.s." You state these materials were offered in non-bulk packaging not meeting any of the conditions listed in 5.3.2.1.1 of the IMDG Code that would require marking of the UN ID numbers on cargo transport units. Specifically, you ask for confirmation of your understanding that the display of UN ID numbers is not required on your dangerous goods containers per the requirements of the IMDG Code.

Based on the shipping paper and scenario you have provided, it is the opinion of this Office that your understanding is correct. In accordance with 5.3.2.1.1 of the IMDG Code, your dangerous goods container, as described, would not be required to display UN ID numbers. Provided all or part of the movement is by vessel, hazardous materials may be offered for transportation or transported to, from, or within the U.S. in accordance with the requirements of the IMDG Code and all applicable requirements of Part 171, Subpart C. See §§ 171.22, 171.23, and 171.25.

I hope this answers your inquiry. If you need additional assistance, please contact this Office again.

Sincerely,

Dirk Der Kinderen
Acting Chief, Standards Development Branch
Standards and Rulemaking Division

COSMO

Restko
172.332
Markings
15.0180

August 8th, 2015

US Department Of Transportation
Maritime Administration – West Building
1200 New Jersey Avenue, SE
Washington, DC 20590

Re.: Marking Requirements of cargo transport units vs local requirements (other countries)

Dear Sir or Madam,

We are in the need of a formal written answer / response to the following situation:

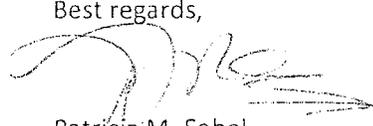
Our corporate office in Peru is requesting our help with the marking of all containers exported from the US, specifically they want us to display the UN Numbers corresponding to all the classes of dangerous goods loaded inside the container(s).

According to IMDG 5.3.2.1, we are only required to display the UN Numbers in consignments described under 5.3.2.1.1, none of the situations described on 5.3.2.1.1 would apply to our handling operations. We have also reviewed 5.3.2 UN Recommendations on the transport of dangerous goods and none would either apply. We follow all the other placarding requirements according to IMDG.

Please be kind enough to confirm if we are correct with our determination and if there would be any circumstances in which we could assist our corporate office with this request. Our goal is to provide them with an official confirmation so they pursue the support from their transportation partners / contractors in observing national requirements.

Thank you and we look forward to your reply.

Best regards,


Patricia M. Sobel
Regulatory Manager