



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

1200 New Jersey Ave., S.E.  
Washington, DC 20590

JAN 16 2015

Mr. Andrew Romach  
Regulatory Compliance Manager  
URS Corporation  
1600 Perimeter Park Drive  
Morrisville, NC 27560

Reference No. 14-0228

Dear Mr. Romach:

This is in response to your November 19, 2014 letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the proper shipping name marking size for IBCs that are labeled instead of placarded. Specifically, in the case of an IBC labeled in accordance with § 172.514(c), you ask if a proper shipping name with a height of 6 mm and a UN identification number with a height of 12 mm displayed adjacent to the hazard label is authorized.

The answer is yes. Section 172.336(d) provides a special provision for the display of identification numbers that permits a bulk packaging that is labeled instead of placarded in accordance with 172.514(c) to display identification number markings consistent with the requirements of § 172.301(a)(1). Section 172.301(a)(1) prescribes a 12 mm minimum height requirement for the identification number for an IBC; however, a minimum height for the proper shipping name is not prescribed. In addition, a transitional exception provided in § 172.301(a)(1)(i) prescribes that for domestic transportation, until January 1, 2017, identification number markings are not subject to the 12 mm minimum height requirement.

I trust this information is helpful. If you have further questions, please do not hesitate to contact this office.

Sincerely,

Shane C. Kelley  
Acting International Standards Coordinator  
Standards and Rulemaking Division



November 18, 2014

Mr. Charles Betts, Division Director  
Standards and Rulemaking (PHH-10)  
U.S. Department of Transportation  
Pipeline and Hazardous Materials Safety Administration  
East Building, 2nd Floor  
1200 New Jersey Ave., SE  
Washington, DC 20590

Werner  
§ 172.514(c)(4)  
Labeling  
14-0228

Dear Mr. Betts:

I am writing to you to request a Department of Transportation (DOT) interpretation concerning the required size for the UN identification number and proper shipping name displayed adjacent to the hazard label applied on an intermediate bulk container (IBC). As allowed by 49 CFR 172.514(c)(4), an IBC may be labeled instead of placarded. 49 CFR 172.514(c)(4) also sets out that, when labeled, the IBC may display the proper shipping name and UN identification number in accordance with the size requirements of 49 CFR 172.302(b)(2) in place of an orange panel, placard or white square-on-point. This requirement is optional.

49 CFR 172.302(a) sets out the requirements for the *Identification numbers*. The *Size of markings* listed in 49 CFR 172.302(b)(2) requires a width of at least 4.0 millimeters (0.16 inch) and a height of at least 25 millimeters (one inch) for IBCs. Proper shipping name is not addressed in 49 CFR 172.302(a) or (b).

49 CFR 172.336(d) with the heading "Identification number Special Provisions" sets out requirements that when a bulk packaging is labeled rather than placarded in accordance with 49 CFR 172.514(c), the identification number may be marked in accordance with 49 CFR 172.301(a). An IBC is one of the bulk packaging options listed in 49 CFR 172.514(c). 49 CFR 172.336(d) references 49 CFR 172.301(a), which requires a minimum size for the UN identification number of at least 12 millimeters (0.47 inch). Marking requirements for the proper shipping name are also listed in 49 CFR 172.301(a); however, no minimum size for the proper shipping name is given.

A minimum marking size of 12 millimeters is currently required for the UN identification number displayed on an IBC when following the International Maritime Dangerous Goods Code (IMDG) (5.2.1.1). No minimum proper shipping name size is given.

Question: When shipping an IBC that displays hazard labels, would a proper shipping name with size 6 millimeters and a UN identification number with size 12 millimeters displayed adjacent to the hazard label be acceptable?

I would appreciate your assistance with this question.

Sincerely,

Andrew N. Romach  
Regulatory Compliance Manager  
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