



U.S. Department
of Transportation

1200 New Jersey Avenue SE
Washington, DC 20590

**Pipeline and Hazardous
Materials Safety
Administration**

JAN 08 2016

Mr. Michael Lesser
Crowley Liner Service
9487 Regency Square Blvd.
Jacksonville, FL 32225

Ref. No.: 15-0204

Dear Mr. Lesser:

This responds to your October 12, 2015 email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to limited quantities. Your questions are paraphrased and answered below:

Q1. Does a freight container with a quantity of hazardous material that requires placarding also require a limited quantity mark for additional hazardous material?

A1. A freight container that requires placarding is not required to display the limited quantity mark. When intended for transport by vessel, a freight container containing packages of hazardous material in limited quantities and no other hazardous materials must be marked with the limited quantity mark once on each side and each end of the exterior of the freight container (see § 172.315(a)(2)).

Q2. Is a freight container required to display the limited quantity placard from the point of origin or can the limited quantity mark be applied at the port facility?

A2. When intended for transport by vessel, a cargo transport unit containing only packages of hazardous material in limited quantities must be marked once on each side and each end of the exterior of the unit. Subsequent highway or rail movements of that shipment may choose to utilize domestic exceptions offered by the HMR if the shipment qualifies for the exception. Please note that §§ 171.22(d) and 171.25(a) provide that a hazardous material subject to the requirements of the International Maritime Dangerous Goods (IMDG) Code, that is offered or intended for eventual transportation by vessel, but not subject to the HMR may be transported in the U.S. when described, marked and labeled in accordance with the IMDG code.

I hope this answers your inquiry. If you need additional assistance, please contact the Standards and Rulemaking Division at (202) 366-8553.

Sincerely,

Duane A. Pfund
International Standards Coordinator
Standards and Rulemaking Division

Leary
§ 172.315
Marking
15-0204

Dodd, Alice (PHMSA)

From: Geller, Shelby CTR (PHMSA)
Sent: Tuesday, October 13, 2015 4:38 PM
To: Hazmat Interps
Subject: FW: Limited Quantity Markings - Vessel Transportation

Dear Shante and Alice,

Forwarded is a request for a formal letter of interpretation. I spoke with Michael Lesser.

Thanks,
Shelby

From: Lesser, Michael [mailto:Michael.Lesser@crowley.com]
Sent: Tuesday, October 13, 2015 3:39 PM
To: Geller, Shelby CTR (PHMSA)
Subject: RE: Limited Quantity Markings - Vessel Transportation

Please request a letter of Interpretation

Q: Does a container with a placarded quantity also require a limited quantity marking for additional hazardous commodities offered as limited quantity?

Q: Does a container with limited quantity commodities require the marking to be on the container from the shipping point or may it be applied when it is received at the port facility?

From: shelby.geller.ctr@dot.gov [mailto:shelby.geller.ctr@dot.gov]
Sent: Tuesday, October 13, 2015 3:25 PM
To: Lesser, Michael
Subject: RE: Limited Quantity Markings - Vessel Transportation

Dear Michael,

We have received your inquiry about the hazardous materials regulations (49 CFR Parts 171-180). The hazardous materials regulations are available at the following URL:

<http://phmsa.dot.gov/regulations>

A hazardous materials regulatory specialist would be happy to speak with you regarding your inquiry. You may contact the Hazardous Materials Information Center, which is staffed with regulatory specialists who can quickly answer your questions by phone, Monday through Friday, 9 AM - 5 PM EST at (800) 467-4922 or (202) 366-4488. Alternatively, if you would like a regulatory specialist to contact you directly, please respond to this e-mail with a telephone number where you can be reached between 9 AM and 5 PM EST.

Sincerely,

Shelby, Hazardous Materials Specialist

An e-mail response from this office is considered informal guidance. Formal guidance may be requested in accordance with 49 CFR 105.20. <http://phmsa.dot.gov/hazmat/regs/interps>

From: Lesser, Michael [<mailto:Michael.Lesser@crowley.com>]
Sent: Monday, October 12, 2015 10:01 AM
To: PHMSA HM InfoCenter
Subject: Limited Quantity Markings - Vessel Transportation

Does a container with a placarded quantity of hazardous material also require a limited quantity marking for hazardous material of a different class (than the placard class)?

If a limited quantity marking is not required for road transportation – when is it required to be applied for Ocean Transportation? A compliance officer cited a driver because the shipping papers showed delivery to an off shore point even though driver had not arrived at the port.

Letter of Interpretation please

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