



U.S. Department  
of Transportation

Pipeline and Hazardous  
Materials Safety  
Administration

1200 New Jersey Avenue, SE  
Washington, DC 20590

APR 25 2017

Johnny Johnson  
Alchem Chemical Company  
5360 Tulane Drive, SW  
Atlanta, GA 30336

Reference No. 17-0011

Dear Mr. Johnson:

This letter is in response to your January 31, 2017, e-mail and letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to general marking requirements for non-bulk packages. Specifically, you ask if the 12 mm height requirement is applicable to the UN identification number only, or if it applies to both the UN identification number and the proper shipping name.

This minimum height requirement for characters on a non-bulk package is applicable to the UN identification number only. According to § 172.301(a), the identification number (preceded by "UN," "NA," or "ID," as appropriate) must be marked in characters at least 12 mm (0.47 inches) high. Note that for non-bulk packages with a capacity of 30 liters (8 gallons) or less, the package shall be marked with characters at least 6 mm (0.24 inches) high.

The HMR do not specifically prescribe minimum height requirements for the display of the proper shipping name on a non-bulk package. If a non-bulk package displays characters using the minimum 12 mm or 6 mm height requirements as prescribed in § 172.301(a), the proper shipping name may be displayed in the same manner.

I hope this information is helpful. Please contact us if we can be of further assistance.

Sincerely,

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

**Dodd, Alice (PHMSA)**

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Baker  
§172.301  
marking  
17-0011

**From:** INFOCNTR (PHMSA)  
**Sent:** Wednesday, February 01, 2017 5:22 PM  
**To:** Hazmat Interps  
**Subject:** FW: Request for guidance on 172.301  
**Attachments:** alchem scan.pdf

Hi Shante/Alice,

Please submit this as a letter of interpretation. I spoke with Mr. Johnson.

Please let me know if you have any questions.

Thanks,  
Jordan

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**From:** Johnny Johnson (Alchem Chemical) [mailto:Johnny.Johnson@alchemchemical.com]  
**Sent:** Tuesday, January 31, 2017 1:02 PM  
**To:** PHMSA HM InfoCenter <PHMSAHMInfoCenter@dot.gov>  
**Subject:** Request for guidance on 172.301

I've attached a request for a letter of interpretation/guidance – Please note I've also sent this by US Mail Service (Our mail from the ind park is sometimes very slow in leaving so please forgive me in double submitting) --- Thanks in advance for any assistance you can provide...

Johnny Johnson | [JohnnyJ@alchemchemical.com](mailto:JohnnyJ@alchemchemical.com)  
Alchem Chemical Company  
[alchem@alchemchemical.com](mailto:alchem@alchemchemical.com)  
Ph# 404-696-9202  
Fax# 404-696-8207

January 31, 2017

Dear Sir/Madam

A request for a letter of interpretation in regards to :

§ 172.301 As added to the federal register January 2013 with compliance January 2017 General marking requirements for non-bulk packagings.

(a) Proper shipping name and identification number.

(1) Except as otherwise provided by this subchapter, each person who offers a hazardous material for transportation in a non-bulk packaging must mark the package with the proper shipping name and identification number (preceded by "UN", "NA" or "ID," as appropriate) for the material as shown in the § 172.101 Hazardous Materials Table. The identification number marking preceded by "UN", "NA", or "ID" as appropriate must be marked in characters at least 12 mm (0.47 inches) high. Packages with a maximum capacity of 30 liters (8 gallons) or less, 30 kg (66 pounds) maximum net mass, or cylinders with a water capacity of 60 liters (16 gallons) or less must be marked with characters at least 6 mm (0.24 inches) high. Packages with a maximum capacity of 5 liters (1.32 gallons) or 5 kg (11 pounds) or less must be marked in a size appropriate for the size of the package.

After consulting with our local office and some different compliance companies – their seems to be some vague understanding, or let's say a difference in interpretation on what the Font size should be concerning the Shipping Name vs The UN Id Number in regards to this regulation --- Whether it only applies to the UN Id number or the whole shipping name including the UN Id --- Some say the Regulation as written only applies to the UN Id # only --- while others tell me the two are synonymous in application.. My company, like most in our industry in an effort to save time, money and reduce human



error, in miss marking a package/container moved away from both stenciling and labeling a package/container and putting all the required info on a label.

When looking at our industry as a whole most companies seem to be on both sides of how this regulation is applied. --- If you could please clarify whether the 12mm size requirement applies only to the UN Id or both the UN Id and Shipping Name on packages greater than 30 liter's. I've sent a copy of a label for a drum with the Shipping Name at 6mm and UN Id 12mm as you see this takes up a big portion of the label --- if the size requirement only applies to the UN Id only it would certainly aid in label generation and efficiency in marking a package.

Thanks in advance for your help, in helping me and my company in understand the application of this particular regulation.

Best Regards

Johnny Johnson

A handwritten signature in black ink, appearing to read "Johnny Johnson", written over the printed name.

Alchem Chemical Co  
5360 Tulane Dr. SW  
Atlanta GA 30336  
404-696-9202

# Surfactant N-40

(Surfonic® N-40, N-40, NP4)

CAS No. 127087-87-0

HEALTH	2
FLAMMABILITY	1
REACTIVITY	0
PERSONAL PROTECTION	

Lot#

Date

## WARNING

### HAZARD STATEMENTS:

Causes skin and eye irritation.  
Toxic to aquatic life with long lasting effects.

### PRECAUTION STATEMENTS:

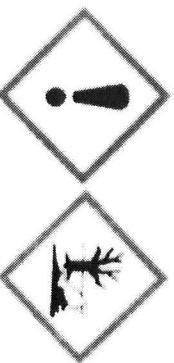
Wear protective gloves. Wear eye or face protection. Avoid release to the environment. Wash hands thoroughly after handling. Collect spillage. IF ON SKIN: Wash with plenty of soap and water. Take off contaminated clothing. Wash contaminated clothing before reuse. If skin irritation occurs: Get medical attention. IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. If eye irritation persists: Get medical attention. Dispose of contents and container in accordance with all local, regional, national and international regulations.

450 LB/Drum

**Environmentally Hazardous**  
**Substance, liquid n.o.s (Nonylphenol,**  
**Ethoxylate)**

**Marine Pollutant**

**UN3082**



**macd**

Industrial Use Only. Do Not Weld or Cut on Empty Container.

macd  
Chemical Distributors

CAUTION: Please read the Safety Data Sheet prior to use.

FOR CHEMICAL ASSISTANCE CALL CHEMTREC - 800-424-9300