



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

APR 16 2007

400 Seventh Street, S.W.
Washington, D.C. 20590

Mr. Leighton Ford
Sandia National Laboratories
Environmental Management Department
7011 East Avenue MS 9221
Livermore, CA 94550

Ref. No.: 07-0060

Dear Mr. Ford:

This responds to your letter dated March 13, 2007, regarding display of the UN marking or symbol on packagings (e.g., UN standard or specification drums) in accordance with the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Your questions are paraphrased and answered as follows:

- Q. Section 178.503(a)(1) permits the letters "UN" to be applied in place of the symbol; however, the regulations do not specifically state that the upper case "UN" letters may be used in the symbol. Is there any distinction between using upper case "UN" letters vs. lower case "un" letters in the symbol or in place of the symbol as allowed by § 178.503(a)(1)?
- A. The answer is yes. The design of the United Nations' symbol is distinctive and allows the United Nations' symbol to be read the same regardless of orientation (upside down or right side up) on the package. A packaging conforming to a UN standard must be marked with the United Nations' symbol (i.e., lower case "un" letters within a circle) as illustrated in paragraph (e) of §178.503. For embossed metal receptacles, the letters "UN" may be used in place of the United Nations symbol on a UN standard or specification package.
- Q. Section 178.503(a)(1) requires the side marking and the bottom marking to be the same information as that found on the bottom of the drum (permanently embossed). Do the side marking and bottom marking of the drum in the photographs we submitted meet the specification package marking requirements under the HMR?
- A. The photographs you provided are unclear. The two black and white photographs of the label or sticker of the side markings on the drum, previously e-mailed to us, are clearer; however, the UN symbol on the label or sticker, which must be shown in lower case "un" letters, does not meet the UN standard or specification package marking requirements under the HMR.



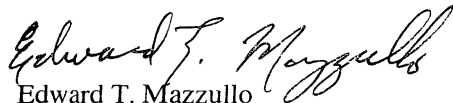
070060

178.503(a)(1)

UN standard packagings must be marked as specified in §§ 178.3 and 178.503. As prescribed in § 178.3, for packages with a gross mass of more than 30 kg (66 pounds), the markings must appear on the bottom or the side of the packaging. In accordance with §178.503(a)(1), every new metal drum having a capacity of 100 L must bear the marks described in paragraphs (a)(1) through (a)(6) and (a)(9)(i) in a permanent form on the bottom. The markings on the top, head or side of these packagings need not be permanent.

I hope this information is helpful. If we can be of further assistance, please contact us.

Sincerely,

A handwritten signature in cursive script that reads "Edward T. Mazzullo".

Edward T. Mazzullo
Director, Office of Hazardous
Materials Standards

Leighton Ford
Waste Program Engineer

Engrum
§ 178.503(a)
Marking of Packagings
07-0060



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March 13, 2007

Mr. Edward T. Mazzullo, Director
Office of Hazardous Materials Standards (PHH-10)
Pipeline and Hazardous Materials Safety Administration
U. S. Department of Transportation
400 Seventh Street, S.W., RM 8430
Washington, D.C. 20590-0001

Dear Mr. Mazzullo,

Sandia National Laboratories/California wants to be sure that the drums and its respective markings that we have ordered from the manufacturer currently meet DOT specifications. Per your request, Sandia National Laboratories/California is formally asking DOT, in writing, the following questions:

Question 1: It states in 178.503(a) (1) that the letters "UN" may be applied in place of the symbol, however, in our case, the regulations does not specifically address the notion that the "UN" letters can be used in the symbol. Also, is there any distinction between using upper case "UN" versus lower case "un" in the symbol or in place of the symbol as allowed by 178.503(a)(1)?

Question 2: Also, 178.503(a)(10) states that the side marking and the bottom marking must be the same information as that found on the bottom of the drum (permanently embossed). Does the side marking and the bottom marking of the drum that we ordered (pictures of marking supplied) comply with this section of 49 CFR?

Sandia National Laboratories/California is enclosing three pictures for your review. Please compare the marking on the side of the drum with that of the marking on the bottom of the drum to see if meets DOT specifications. Thank you ahead of time for your prompt attention to this matter.

Sincerely,

Leighton Ford
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(9) Enclosures