



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety Administration**

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

MAR 13 2007

Mr. Jim Hara
Lockheed Martin Missiles and Space Company
1111 Lockheed Martin Way
Sunnyvale, CA 94086

Ref. No.: 07-0038

Dear Mr. Hara:

This is in response to your February 14, 2007 letter regarding the marking of plywood boxes. You asked whether a tape covered paper label may be used to mark the UN certification on the plywood box under § 178.3 of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180).

The marking requirements under § 178.3(a)(3) state that "markings must be stamped, embossed, burned, printed or otherwise marked on the packaging to provide adequate accessibility, permanency, contrast, and legibility so as to be readily apparent and understood." The specific sizes for letters and numerals must be as required in § 178.3(a)(4). Use of a tape covered paper label is authorized to mark the UN certification on plywood boxes provided the offeror can assure that the above requirements are met.

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

Sincerely,

Hattie L. Mitchell
Chief, Regulatory Review and Reinvention
Office of Hazardous Materials Standards



070038

178.3(a)(3)
173.476

Pollack
§178.3

§173.476

Packagings
07-0038

Jarman, Erin <PHMSA>

From: Thomas R. Stephenson [tstephen@mtshasta.lmms.lmco.com]
Sent: Wednesday, February 14, 2007 12:17 PM
To: INFOCNTR <PHMSA>
Cc: Jim.Hara@lmco.com; Thomas.Stephenson@lmco.com
Subject: Information Center Comments/Questions

This is a request for formal interpretation.

Email: Jim.Hara@lmco.com

Name: Jim Hara

Category: Shipper-General Requirements for Shipments and Packaging (Sections 173.1 - 173.476)

Organization: Lockheed Martin Missiles and Space Company

Street: 1111 Lockheed Martin Way

City: Sunnyvale

State: California

Zip Code: 94086

Phone: 408/756-6520

Fax: 408/756-6285

Comments: I have a container marked 4D/X49/S/96/USA/+AG0217 provided by the Air Force as Government Furnished Equipment for shipment and storage Time Frequency Standard part number FTS4160-C (NSN 6625-01-342-3798) (Caesium UN1470). The container is marked as below:

2/14/2007