



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

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

MAR 31 2006

Mr. Russ Shanahan
REG Scan
800 West Fourth Street
Williamsport, PA 17701

Ref. No.: 06-0050

Dear Mr. Russ Shanahan:

This responds to your letter dated February 14, 2006 regarding the marking requirements under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) as they apply to the display of identification number marking on a closed transport vehicle containing multiple bulk packages.

- Q1. Are two "UN1993" identification number markings required to be displayed on a closed transport vehicle containing two bulk packagings of a material described as "Flammable liquid, n.o.s., 3, UN 1993, PG 1."
- A1. For a bulk packaging contained in or on a transport vehicle or in a freight container, if the identification number marking on the bulk packaging is not visible, the transport vehicle or freight container must be marked on each side and each end with the identification number specified for the material in the § 172.101 Table (See § 172.332).

As specified in § 172.302(a), a bulk packaging must be marked with the identification number and displayed as required by § 172.332 on each side and each end of the bulk packaging, if the capacity of the packaging is 3,785 L (1,000 gallons) or more, or on two opposing sides, if the packaging has a capacity of less than 3,785 L (1,000 gallons). Additional requirements for marking bulk packagings, such as a portable tank, cargo tank, tank car and multi-unit tank car tank, and other bulk packaging (e.g., IBCs) are prescribed in §§ 172.326, 172.328, 172.330 and 172.331, respectively.

- Q2. Would the answer to "Q1" change if the products had the same technical names?
- A2. No.
- Q3. Are the two identification number markings, "UN1993" and "NA1993", required to be displayed on a closed transport vehicle containing two bulk packagings of



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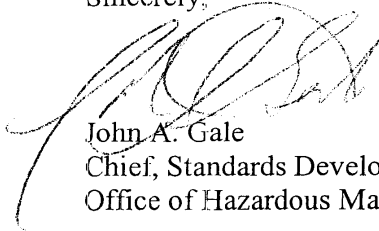
172.302
172.331

materials described as “Flammable liquid, n.o.s., 3, UN 1993, PG 1” and
“Combustible liquid, n.o.s, Combustible liquid, NA 1993, PG III.”

- A3. See answer “A1”. In this case, the identification numbers are essentially the same. The marking “UN1993” is used for both domestic and international transportation, while the marking “NA1993” may only be used for domestic transportation. Each bulk packaging must be placarded in accordance with § 172.504.

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

Sincerely,



John A. Gale
Chief, Standards Development
Office of Hazardous Materials Standards



Engram
§172.302
§172.331
Markings
06-0050

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Feb 14, 2006

Mr. Edward T. Mazzullo
Director of Hazardous Materials Standards
US DOT/PHMSA (PHH-10)
400 7th St South-West
Washington, DC 20590-0001

RE: Letter of Interpretation – Multiple Bulk ID Marking Requirements

Dear Mr. Mazzullo,

I would appreciate a clarification on vehicle marking requirements when multiple bulk packages are on board. For each of these questions, please assume that each bulk package is contained within a truckload and no part of the bulk package is exposed from the outside.

1. Given this load:

Flammable Liquid, n.o.s., 3, UN1993, PG I, Bulk

Flammable Liquid, n.o.s., 3, UN1993, PG I, Bulk

Are two 1993 markings required on the vehicle, or is only one 1993 marking required on the vehicle?

2. Would the answer to question #1 change based on whether the products had the same technical names?

3. Given this load:

Flammable Liquid, n.o.s., 3, UN1993, PG I, Bulk

Combustible Liquid, n.o.s., Comb Liq, NA1993, PG III, Bulk

Are two 1993 markings required on the vehicle, or is only one 1993 marking required on the vehicle?

Thank you for your consideration.

Sincerely,

Russ Shanahan