



U.S. Department
of Transportation
**Research and
Special Programs
Administration**

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

MAR 21 2003

Mr. Raymond T. Duzynski
Regulatory Analyst
3M General Office
3M Center
St. Paul, MN 55144-1000

Ref. No. 02-0201

Dear Mr. Duzynski:

This responds to your July 23, 2002 letter requesting an interpretation of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to shipping papers. Specifically you ask if it is necessary to remove the letters "RQ" and the name of the hazardous substance(s) from the shipping paper for the return trip of a bulk package other than a tank car when the residue in the package no longer meets the definition of a hazardous substance and the phrase "RESIDUE: Last Contained ***" does not appear on the shipping paper before the basic description.

The answer is no. In accordance with § 172.203(e)(2), the description on the shipping paper for a tank car containing the residue of a hazardous material must include the phrase "Residue: Last Contained * * *" before the basic description. If, when fully loaded, the correct shipping description for the material in the tank car required the letters "RQ" to be included, the letters "RQ" are not required to be removed from the shipping paper description when the residue in the tank car no longer meets the definition of a hazardous substance.

I hope this information is helpful. If we can be of further assistance, do not hesitate to contact us.

Sincerely,

Delmer F. Billings
Chief, Standards Development
Office of Hazardous Materials Standards



020201

172.203(e)(2)

3M General Office

3M Center
St. Paul, MN 55144-1000
651 733 1110

Foster
§172.203(e)(2)
Shipping Papers
82-0201

July 23, 2002



Mr. Edward T. Mazzullo
Director, Office of Hazardous Materials Standards
DHM-10 (Room 8422)
U.S. Department of Transportation
Research and Special Programs Administration
Office of Hazardous Materials Standards
400 Seventh Street, SW
Washington, DC 20590-0001

Subject: Interpretation Letter Request

Dear Mr. Mazzullo:

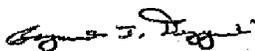
In the enclosed DOT Letter of Interpretation (Reference No. 01-0137) dated August 16, 2001, it states the letters "RQ" may only be entered on the shipping paper if a material meets the definition of a hazardous substance under Section 171.8.

In the enclosed DOT Letter of Interpretation (Reference No. 01-0210) dated January 18, 2002, it states that the letters "RQ" are not required to be removed from the shipping paper when the residue in the tank car no longer meets the definition of a hazardous substance. The tank car discussed in this DOT Letter of Interpretation originally contained an "RQ" of ethylbenzene and the shipping paper for return trip of the tank car includes the phrase "Residue: Last Contained ***" before the basic description as required per Section 172.203(e)(2).

Based on this information, could you comment on whether it is necessary to remove the letters "RQ" and the name of the hazardous substance(s) from the shipping paper for the return trip of bulk package other than a tank car (e.g., portable tank) when the residue in the package no longer meets the definition of a hazardous substance and the phrase "Residue: Last Contained ***" does not appear on the shipping paper before the basic description.

If you have any questions or need additional information, please contact me on 651-733-9042.

Sincerely,


Raymond T. Duzynski
Regulatory Analyst

Enclosures