



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, D.C. 20590

DEC 3 2007

Mr. Mark Connolly
Manager, Transportation Regulations and Security
Akzo Nobel Chemicals, Inc.
525 W. Van Buren Street
Chicago, IL 60706

Ref. No.: 07-0211

Dear Mr. Connolly:

This responds to your October 29, 2007, letter regarding the description of hazardous materials on shipping papers required under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you request clarification on the following abbreviations used to describe the type of package on a shipping paper: (1) "T/T" or "TT" to describe a cargo tank or a tank truck, and (2) "ISOTANK" to describe an intermodal portable tank?

Section 172.202(a)(7) requires the number and type of packages to be indicated on a shipping paper. The type of packages must be indicated by description of the package (e.g., "drum") or abbreviation (e.g. "cyl" for "cylinder"). The abbreviations you provide are commonly accepted and recognizable and thus, may be used to indicate packaging type.

I hope this answers your inquiry.

Sincerely,

A handwritten signature in black ink, appearing to read "John A. Gale".

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

Leary
§ 172.202 (a)(7)
Shipping Papers
07-0211



October 29, 2007

Mr. John Gale
Office of Hazardous Materials Standards (PHH-10)
Office of Hazardous Materials Safety
Pipeline and Hazardous Materials Safety Administration
U.S. Department of Transportation
East Building, 2nd Floor
1200 New Jersey Avenue, SE
Washington, DC 20590-0001

**Subject: HM-215 E Use of Commonly Acceptable Recognizable Abbreviations
for
Certain Bulk Packages in Accordance with 49CFR172.202 (a) (7)**

Dear Mr. Gale:

Akzo Nobel Chemicals strives to meet the requirements for description of the type of package on the shipping paper. We have received questions about abbreviations for certain package types from carrier personnel confused by their interpretations of Final Rule HM-215E.

For Bulk packages we request the clarification for the use of the following abbreviations:

"T/T" or "TT"	for Cargo Tank
"ISOTANK"	for the large (approximately 10,500 liters thru 25,000 liters capacity) intermodal portable tank designed to be removed from a chassis for intermodal transport.

We have discussed the use of T/T or TT with our tank truck carriers and they are in agreement that this is a common recognizable abbreviation for the package type tank truck.

We have discussed the use of the term ISOTANK with personnel from our highway carriers, our Isotank leasing companies, and also ocean carrier personnel. They are in agreement that this is a common recognizable abbreviation for the package type portable tank.

Your clarification is appreciated.

Regards,

Manager, Transportation Regulations and Security

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