



U.S. Department
of Transportation

Pipeline and Hazardous
Materials Safety
Administration

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

AUG 22 2016

Ms. Amanda Hammon
Product Safety Representative
1144 East Newport Center Drive
Deerfield Beach, FL 33442

Reference No. 16-0104

Dear Ms. Hammon:

This letter is in response to your June 9, 2016, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to voluntary information describing a hazardous material on shipping papers and package markings. We have paraphrased and answered your questions as follows:

- Q1. You ask whether materials properly classified as identification number "UN1133" may be described with both "Adhesives" and "Adhesives, *containing a flammable liquid*" as the proper shipping name for the purposes of shipping papers and package markings.
- A1. The answer is yes. In accordance with § 172.101(c)(2), "Punctuation marks and words in italics are not part of the proper shipping name, but may be used in addition to the proper shipping name." For UN1133, the Hazardous Materials Table (HMT) lists the name "Adhesives" in Roman type as the proper shipping name. The phrase "*containing flammable liquid*" is in italics and, therefore, may be permissively included as part of the proper shipping name on shipping papers and package markings in accordance with part 172 subparts C and D, respectively.
- Q2. You ask whether a technical name may be provided on a shipping paper or package marking in between the proper shipping name and hazard class for HMT entries that do not include a "G" in Column 1.
- A2. The answer is yes. Many entries in the HMT do not include a "G" in Column 1 and are not otherwise required to include a technical name on a shipping paper under § 172.203(k). However, a shipper may voluntarily include a technical name on a shipping paper following the basic description or in parenthesis between the proper shipping name and hazard class (see § 172.202(d)).

Section 172.301(b) requires non-bulk packages containing a hazardous material, subject to the provisions of § 172.203(k), to be marked with the technical name. This section prohibits packages containing materials in Division 6.2 from displaying the technical

name on the outside of the package. The HMR do not otherwise prohibit technical names from being displayed on the outside of the package.

- Q3. You ask whether the hazard class and packing group may be displayed on the outer package following the identification number and proper shipping name in a location near the hazard class label.
- A3. The answer is yes. The HMR do not prohibit additional information from being displayed on the outer packaging after the information required by part 172 subpart D, provided the information properly describes the material.

I hope this information is helpful. Please contact us if we can be of further assistance.

Sincerely,

A handwritten signature in cursive script, appearing to read "T. Glenn Foster".

T. Glenn Foster
Chief, Regulatory Review and Reinvention Branch
Standards and Rulemaking Division

Goodall, Shante CTR (PHMSA)

Kehman
172.200
Applicability
16-0104

From: Rivera, Jordan CTR (PHMSA)
Sent: Tuesday, June 14, 2016 10:10 AM
To: Hazmat Interps
Subject: FW: WRITTEN RESPONSE REQUIRED

Hi Shante/Alice,

Please submit this as a letter of interpretation. Please let me know if you have any questions.

Thanks,
Jordan

From: Hammon, Amanda [<mailto:AHammon@mapei.com>]
Sent: Tuesday, June 14, 2016 7:41 AM
To: INFOCNTR (PHMSA)
Subject: RE: WRITTEN RESPONSE REQUIRED

Jordan,

Thank you for submitting my formal request.

AMANDA HAMMON
1144 EAST NEWPORT CENTER DRIVE
DEERFIELD BEACH, FLORIDA 33442

Regards,

Amanda Hammon

From: INFOCNTR (PHMSA) [<mailto:INFOCNTR.INFOCNTR@dot.gov>]
Sent: Monday, June 13, 2016 4:46 PM
To: Hammon, Amanda
Subject: RE: WRITTEN RESPONSE REQUIRED

Dear Amanda,

We have received your request for a written letter of interpretation regarding the hazardous materials regulations (49 CFR Parts 171-180). The hazardous materials regulations are available at the following URL:

<http://phmsa.dot.gov/regulations>

In order for your request to be submitted, you must respond to this email with a mailing address.

Typically, written letters of interpretation are responded to at minimum of approximately 8 weeks from when they are received by the Office of Hazardous Materials Standards. However, delivery time of a written interpretation can vary markedly based on topic complexity and the backlog of letters to be completed.

Sincerely,

Jordan, Hazardous Materials Specialist

An e-mail response from this office is considered informal guidance. Formal guidance may be requested in accordance with 49 CFR 105.20. <http://phmsa.dot.gov/hazmat/regs/interps>

From: Hammon, Amanda [<mailto:AHammon@mapei.com>]
Sent: Monday, June 13, 2016 2:01 PM
To: PHMSA HM InfoCenter
Subject: WRITTEN RESPONSE REQUIRED

I greatly appreciate the help and phone calls regarding my questions below, however I need an answer in writing.

Thanks,

Amanda Hammon

From: Hammon, Amanda
Sent: Thursday, June 09, 2016 9:28 AM
To: 'phmsa.hm-infocenter@dot.gov'
Subject: Additonal Information On HazMat Packaging

To Whom It May Concern,

First off, what are the acceptable proper shipping name(s) for UN1133; Adhesives containing a flammable liquid. Is UN1133; Adhesives, UN1133; Adhesives containing a flammable liquid, or both correct proper shipping names? This proper shipping name will be included on the shipping papers as well as on the outer packaging, next to the hazard class label.

Secondly, is it prohibited to include technical names in between the proper shipping name and the hazard class for hazardous material descriptions and proper shipping names that do not contain a G in column 1 of 172.101 Hazardous Materials Table? These technical names would accurately describe the substances triggering the classification and would be included on the shipping papers as well as on the outer packaging, next to the hazard class label.

Finally, is it prohibited to include the hazard class and packing group on the outer packaging where it would follow the UN number and proper shipping name, and also be located next to the hazard class label?

I would greatly appreciate the response to the questions above be communicated via email so that I may report back to upper management and document appropriately. Thank you so much.

Regards,

Amanda Hammon

Amanda Hammon – Product Safety Representative | Research & Development
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