



U.S. Department of Transportation
**Pipeline and Hazardous Materials
Safety Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

DEC 2 2009

Mr. Stephen V. Schulte, CHMM, CPP, DGSA
Director, Global Transportation Compliance
Ecolab
370 Wabasha Street N
St. Paul, MN 55102

Ref. No. 09-0237

Dear Mr. Schulte:

This responds to your October 22, 2009 request for clarification of shipping paper requirements under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if commonly used names of packagings may be used to satisfy the requirements in §172.202(a)(7) to indicate the type of packaging on shipping papers.

The answer is yes. Commonly used and recognizable names for a packaging, such as pail, box, drum, cylinder, and the like, may be used to describe the type of packaging on shipping papers under §172.202(a)(7) requirements.

I hope this answers your inquiry. If you need additional assistance, do not hesitate to contact this Office.

Sincerely,

Charles E. Betts
Chief, Standards Development
Office of Hazardous Materials Standards

Boothe
§ 172.202(a)(7)
Shipping Papers
09-0237

October 22, 2009

Mr. Edward T. Mazzullo
Director, Office of Hazardous Materials Standards
Pipeline and Hazardous Materials Safety Administration
U.S. Department of Transportation
East Building, 2nd Floor
1200 New Jersey Ave., SE
Washington, DC 20590

Re: Request Letter of Interpretation 49 CFR § 172.202(a)(7) – Type of Packaging

Dear Mr. Mazzullo:

This is a follow up to our conversation regarding the type of packages that must be indicated on shipping papers, manifests and bills of lading for hazardous materials in transportation.

It is my understanding that any commonly referred to name, such as pail, box, drum, etc. may be used to satisfy the requirements of 49 CFR § 172.202(a)(7) and that it is not required to be a term used in 49 CFR § 173.201 – § 173.213.

Sincerely,

Stephen V. Schulte

Stephen V. Schulte, CHMM, CPP, DGSA
Director, Global Transportation Compliance