



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

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

DEC 22 2010

Mr. Donald H. Hausmann
HAZMATPAC
5301 Polk Street, Bldg. 18
Houston, Texas 77023

Ref. No.: 10-0154

Dear Mr. Hausmann:

This responds to your letter regarding the number and type of UN marking which may be placed on a combination packaging, UN4G or UN4GV box, in accordance with the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Your questions are paraphrased and answered as follows:

You provided the following examples:

- Example 1:** One box tested and marked “UN4GV/X12” and “UN4GY20”, containing 4 one liter glass bottles and 8 one quart plastic bottles, respectively.
- Example 2:** One box tested and marked “UN4G/X35” and “UN4G/Y26”, containing one large explosive cartridge and 4 one gallon plastic bottles, respectively.
- Example 3:** One box tested and marked “UN4G/Y27” and “UN4G/Z37”, containing 4 four liter glass bottles.
- Example 4:** One box tested and marked “UN4G/Y28”, “UN4G/X26”, “UN4GV/X15”, and “UN4G/Z35”, containing 4 one gallon glass bottles, 4 one gallon metal cans, 4 one quart glass bottles and 4 one gallon plastic bottles, respectively.
- Example 5:** One box tested and marked with eight different markings:
- A: “UN4G/X28” and “UN4G/Y42”, containing 4 one gallon glass bottles;
 - B: “UN4G/X26” and “UN4G/Y40”, containing 4 one gallon plastic bottles or 4 one quart glass bottles;
 - C: “UN4GV/X15”, containing 4 one quart glass bottles;
 - D: “UN4GV/X8”, containing 4 eight ounce glass bottles; and
 - E: “UN4G/Y30” and “UN4G/Z45”, containing 4 one gallon plastic bottles.

You also asked if the end user would have to cover up the marking that was not used for the respective shipment.

Where a packaging conforms to more than one UN standard or DOT specification, the packaging may bear more than one marking, provided the packaging meets all the requirements of each standard or specification, and documentation must be maintained by the packaging manufacturer. Where more than one marking appears on a packaging, each marking must appear in its entirety. Therefore, multiple package markings are not prohibited on a packaging, such as a UN4G box containing a variety of inner packagings (See §178.3(c)). The conditions for use would have to be clearly set forth in the notification to users required by § 178.2(c). However, to avoid potential confusion and/or possible violation of the HMR, the non-applicable marking should be covered or obliterated during transportation.

I hope this satisfies your inquiry. If we can be of further assistance, please contact us.

Sincerely,

A handwritten signature in black ink that reads "Ben Supko". The signature is written in a cursive style with a large, prominent "B" and "S".

Ben Supko
Acting Chief, Standards Development Branch
Standards and Rulemaking Division

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Pipeline and Hazardous Material Safety Admin.
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I am looking for clarification of the number and type of United Nations marking which may be placed on a single 4G or 4GV box. In each example listed below all ratings marked on the box completed the United Nations testing.

Is it appropriate to mark an outer corrugated box with two different test reports? By way of example, is it appropriate to put two markings on one box if the box is tested and marked with a 4GV/X12 for 4 one liter glass bottles and a 4G/Y20 marking for 8 one quart plastic bottles. If so, would the end user have to cover up the marking which was not used for the shipment?

By way of example, is it appropriate to put two markings on one box if the box is tested and marked with a 4G/X35 for one large explosive cartridge and a 4G/Y26 marking for 4 one gallon plastic bottles. If so, would the end user have to cover up the marking which was not used for the shipment?

By way of example, is it appropriate to put two markings on one box if the box is tested and marked with a 4G/Y27 for 4 four liter glass bottles and a 4G/Z37 marking for 4 four liter glass bottles. If so, would the end user have to cover up the marking which was not used for the shipment?

Is it appropriate to mark an outer corrugated box with four different test reports? By way of example, is it appropriate to put four markings on one box if the box is tested and marked with a 4G/Y28 for 4 one gallon glass bottles and a 4G/X26 marking for 4 one gallon metal cans and 4GV/ X15 for 4 one quart glass bottles and 4G/Z35 for 4 one gallon plastic bottles. If so, would the end user have to cover up the marking which was not used for the shipment?

Is it appropriate to mark an outer corrugated box with eight different test reports? By way of example, is it appropriate to put eight markings on one box if the box is tested and marked with a 4G/X28 and 4G/Y42 for 4 one gallon glass bottles and a 4G/X26 and 4G/Y40 marking for 4 one gallon plastic bottles and 4GV/X15 for 4 one quart glass bottles and 4GV/X8 for 4 eight once glass bottles and 4G/Y30

and 4G/Z45 for 4 one gallon plastic bottles. If so, would the end user have to cover up the marking which was not used for the shipment?

Please list the section in the CFR 49 which allows United Nations boxes to be marked with more than one marking and how the end user is to handle the shipment of such marked boxes. If more than one marking is allowed on the outer box why wouldn't more than two markings be allowed? How many markings would be the maximum allowed, could a box be marked with 10, 15 or 20 different markings?

Your time and consideration in this matter are greatly appreciated and I look forward to your response.

Respectfully,

A handwritten signature in black ink, appearing to read "D. Hausmann", written in a cursive style.

Donald H. Hausmann