



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

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

SEP 9 2010

Mr. Cliff Bartley  
Manager Hazardous Materials  
Horizon Lines, LLC  
5800-1 William Mills Street  
Jacksonville, FL 32226

Ref. No.: 10-0166

Dear Mr. Bartley:

This is in response to your July 22, 2010, letter requesting clarification on marking requirements for bulk packagings under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if the technical name is required as part of the marking on portable tanks in accordance with § 172.326.

As provided by § 172.326(a), a portable tank containing a hazardous material must be marked with the proper shipping name for the material as specified in the § 172.101 table on two opposing sides. While marking a technical name in association with the proper shipping name to identify the contents of the material in a portable tank would provide useful information for emergency response purposes, it is not required.

I hope this information is helpful. If you have further questions, please contact this office.

Sincerely,

A handwritten signature in black ink that reads "Ben Supko". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Ben Supko  
Acting Chief, Standards Development  
Office of Hazardous Materials Standards

Thursday, July 22, 2010

Mr. Ed Mazzullo  
Director, Office of Hazardous Materials Standards  
U.S. Department of Transportation  
Pipeline and Hazardous Materials Safety Administration  
East Building, 2nd Floor  
Mail Stop: E21-317  
1200 New Jersey Ave., SE  
Washington, DC 20590

Leary  
§ 172.101  
§ 172.326(a)  
Proper Shipping Name  
10-0166

Dear Mr. Mazzullo,

We are a domestic ocean carrier providing container containerized cargo to offshore domestic locations. Sometimes, our customers who ship bulk ISO tank cargos have their cargo held up in transportation due to the fact that the "technical name" is not included on two sides of the bulk package.

Please provide guidance on whether the technical name is required to be included on the bulk package or ISO cargo tank in conjunction with the Proper Shipping Name.

I have reviewed the marking requirements for portable tanks which is listed in 49CFR172.326(a) pertaining to this issue and states the following:

172.326(a)

"(a) Shipping name. No person may offer for transportation or transport a portable tank containing a hazardous material unless it is legibly marked on two opposing sides with the proper shipping name specified for the material in the § 172.101 table."

Since the "proper shipping name" is different from the "technical name", the regulations here seem to indicate that only the "proper shipping name" is required for the marking of the package.

Thank you for your time attention to this matter.

Sincerely,



Cliff Bartley,  
Horizon Lines, LLC  
Manager Hazardous Materials