

*The International
Trade Compliance
And Operations
Experts for
129 years!*

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DOT Hazardous Material Marking

Questions and Answers

Is the technical name required to be marked on bulk packagings, such as portable tanks, Intermediate Bulk Containers (IBCs) and cargo tanks?

The answer is no. The Hazardous Materials Regulations (HMR) do not require the technical name to be marked on bulk packagings. However, if you choose to do so, it is permissible. Sections 172.326, 172.328, and 172.330 generally require bulk packagings, such as portable tanks, cargo tanks and tank cars, to be marked with the shipping name or appropriate common name, and the identification number.

The International Maritime Dangerous Goods (IMDG) Code Special Provision 274 states that, “for the purposes of documentation and package marking, the proper shipping name shall be supplemented with the technical name” (see 3.1.2.8.1). Therefore, for those materials that are required to comply with Special Provision 274 in Column 6 of the IMDG Dangerous Goods List, you must include the technical name when marking the proper shipping name on bulk packagings. Use of the IMDG Code for transportation through the United States when part of the movement of the hazardous material is by vessel is authorized under § 171.12(b).

Are the proper shipping name and identification number marking in § 172.301(a) required to be in the same sequence as on the shipping paper?

The answer is no. Section 172.301(a) does not require a specific sequence for marking the proper shipping name and identification number on a package.

Does the IMDG Code require packages containing limited quantities to be marked with the UN identification number placed within a diamond?

The answer is yes. Section 3.4.5.2 of the IMDG Code states that limited quantity packages need not be marked with the proper shipping name but, must be marked with the UN identification number placed within a diamond. However, limited quantities of dangerous goods for personal or household use that meet the provisions of section 3.4.7 of the IMDG Code are not required to be marked with the UN identification number within a diamond. *Continued...*

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Questions and Answers *Continued*

A shipper loads 11,000 pounds of flammable liquid, that is marked with the same identification number and proper shipping name, at one loading facility. There is other freight present on the vehicle when the flammable liquid is loaded. Is a driver is required to affix the identification number corresponding to 11,000 pounds of flammable liquid if all of the non-hazardous freight is delivered, leaving only the 11,000 pounds of flammable liquid on the transport vehicle?

The answer is no. The marking requirement found in § 172.301(a)(3) is applicable to the material within the transport vehicle at the time that a large quantity of a single hazardous material in non-bulk packages is loaded. In this example, the transport vehicle contains other freight when the flammable liquid is loaded; therefore, the transport vehicle is not required to be marked with the identification number of the flammable liquid. So long as the shipping paper indicates that the vehicle once held other freight and the driver is familiar with § 172.301(a)(3), these provisions would apply for the duration of the deliveries.

The identification number may be permissively displayed on the transport vehicle on each side and each end. This practice would identify the material and alleviate the potential for a frustrated shipment.

Is the technical name required to be marked on the packaging when using the limited quantity marking found in §172.315?

The answer is no. As specified in § 173.315, marking the package with the identification number inside a white square-on-point configuration identifies the material as a limited quantity and fulfills the HMR marking requirements. If a shipper uses this method to identify a packaging containing a limited quantity, he is not required to mark the shipping name or technical name on the packaging.