



U.S. Department
of Transportation

Research and
Special Programs
Administration

400 Seventh Street, S.W.
Washington, D.C. 20590

JAN - 8 1991

Mr. Randy Martin
Dupont Sourcing
1007 Market St.
Room D-3066
Wilmington, DE 19898

Ref. No. 8864
Ref. No. 88-0064

Dear Mr. Martin:

This is in response to your request for clarification of the use of the phrase "key words" in 49 CFR 172.330(a)(1)(ii). You also ask whether the key words "Flammable Gas" marked on tank cars transporting "Compressed gas, flammable, n.o.s." satisfy the requirement for key words.

To acknowledge shippers' concerns with respect to marking long proper shipping names on tank cars, the Hazardous Materials Regulations (HMR) authorize the use of concise markings, provided they accurately communicate the hazard of the material. A concise marking includes the key words from the proper shipping name. The use of key words in conjunction with the identification number marking and shipping paper description provides an emergency responder with sufficient information to proceed with an accurate course of action.

As an example, when using the North American Emergency Response Guidebook (ERG), the identification number marking must direct the emergency responder to the correct guide number. The key word marking must not be inconsistent with the required shipping description. For the proper shipping name "Compressed gas, flammable, n.o.s.," the ERG references guide number 115. Guide number 115 provides the correct protective actions for gases, flammable (i.e., compressed flammable gases and liquefied flammable gases). Therefore, your proposed key words, "Flammable Gas," effectively convey the hazard of the proper shipping name "Compressed gas, flammable, n.o.s.," and meet the requirements set forth in § 172.330(a)(ii) concerning the use of key words.

I hope this information is helpful. If you need additional information, please do not hesitate to contact this office.

Sincerely,

Edward T. Mazzullo
Director, Office of Hazardous
Materials Standards

172.330



DuPont Sourcing

DuPont Sourcing
Wilmington, DE 19898

Room D-3066

*7/20/88
S.C.*

Ref # 88-0064

December 31, 1996

Mr. Edward Mazzullo
U.S. Department of Transportation
Research and Special Programs Administration
Office of Hazardous Materials Standards (DHM-10)
400 Seventh Street, SW
Washington, DC 20590

Dear Mr. Mazzullo:

A recent change to the regulations enacted by HM-216 moved the requirements for marking tank cars containing certain materials from the Special Provisions in 172.102 to 172.330. The language contained in 172.330(a)(ii) indicates that the tank cars

"...must be marked on each side with the key words of the proper shipping name..."

Yet no where is "key words" defined. Please advise how we should interpret this phrase.

Specifically, if we are shipping a product properly classified as a "Compressed Gas, Flammable, N.O.S.", what must be marked on each side of the tank car? Is "Flammable Gas" sufficient? If not, what else is required?

We very much appreciate your prompt attention.

Sincerely,

R Martin

Randy Martin
Hazardous Materials
Distribution Consultant
Phone: 302-773-4248

974-1000

cc: 76