



U.S. Department  
of Transportation

**Research and  
Special Programs  
Administration**

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

APR 22 1999

Mr. J. J. Quandt  
BP Oil Company  
200 Public Square  
Cleveland, OH 44114-2375

Ref. No. 99-0039

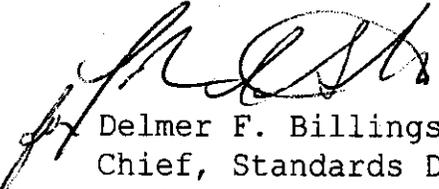
Dear Mr. Quandt:

This is in response to your letter dated February 1, 1999, regarding requirements to identify marine pollutants on shipping papers under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically you ask if you may describe leaded gasoline on a shipping paper as "Gasoline (leaded), 3, UN1203, PG II, Marine Pollutant."

The answer is yes. Section 172.203(1)(1) states that if a proper shipping name for a material that is a marine pollutant does not identify the component making it a marine pollutant, the name of that component must appear in parentheses in association with the basic description. The shipping name "Gasoline" and the description "Marine Pollutant" which appear as part of the shipping description are sufficient to identify the marine pollutant "Gasoline, leaded." It is the opinion of this Office that the description "Gasoline, (leaded), 3, UN1203, PG II, Marine Pollutant" is also an acceptable description for leaded gasoline.

I hope this satisfies your request.

Sincerely,

  
Delmer F. Billings  
Chief, Standards Development  
Office of Hazardous Materials Standards



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172.203



**BP OIL**

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99-0039

February 1, 1999

Edward T. Mazzullo, Director  
O.H.M.S - USDOT/RSPA ( DHM-10)  
400 7 th. STREET S.W.  
Washington, D.C. 20590

**RE: HM Shipping Paper Description for Leaded Gasoline as a Marine Pollutant**

BP OIL CO. is respectfully requesting guidance and clarification regards the correct "proper shipping name " / "basic description" to be used for Aviation gasoline containing lead additive for shipments on-highway in MC-306 / DOT 406 cargo tanks.

The current "proper shipping name" that we are using is;  
GASOLINE ( leaded) 3 UN1203 PGII Marine Pollutant

We reference 49CFR 172.101 Appendix B List of Marine pollutants, and  
49CFR 172.203 (I) Additional description requirements Marine Pollutants.

We have entered the word "leaded " in parentheses as the component which makes the material ( gasoline) a Marine Pollutant as required in 172.203 (I).

We are aware of the RSPA interpretation dated 10/19, 1993 to NTTC regards this same question and permitting the entry " Gasoline, leaded " in parentheses to be omitted.

Our question specifically ; is the entry that I described as that which we are currently using "in violation " of the HM rules ?

May either "GASOLINE (leaded ) 3 UN1203 PGII Marine Pollutant" or " GASOLINE 3 UN1203 PGII Marine Pollutant" be used as the proper shipping name for Aviation Gasoline containing lead ?

Thank you for your time in this request.

J.J. Quandt  
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