



U.S. Department
of Transportation
**Research and
Special Programs
Administration**

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

FEB 18 2001

Mr. Paul M. Krug
Manager, Transportation Compliance
Clean Harbors Environmental Services, Inc.
P.O. Box 859048
Braintree, MA 02185-9048

Ref. No. 00-0356

Dear Mr. Krug:

This responds to your December 13, 2000 letter requesting clarification on the information authorized in a shipping description under §§ 172.202 and 172.203(c) of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask for clarification on where the waste code and letters "RQ" should be located in the proper shipping descriptions provided in your letter.

As provided in § 172.203(c), the waste code used to identify the hazardous substance must be entered in association with the basic description, but should not be placed before the proper shipping name. The letters "RQ" must to be entered on the shipping paper either before or after the basic description. When entering the letters "RQ" and/or the word "Waste", they now become part of the sequence of a shipping description. Examples of proper shipping descriptions for the two products you asked about are:

1. For Waste Mercury:

RQ, Waste Mercury, 8, UN 2809, PG III, (D009)
Waste, Mercury, 8, UN 2809, PG III, RQ, (D009)

2. For Waste Toxic solid, inorganic, n.o.s.:

RQ, Waste, Toxic solid, inorganic, n.o.s., 6.1, UN 3288, PG II (Lead sulfate, Silver chloride) (D008)
Waste, Toxic solid, inorganic, n.o.s., 6.1, UN 3288, PG II, (Lead sulfate, Silver chloride), RQ, (D008)



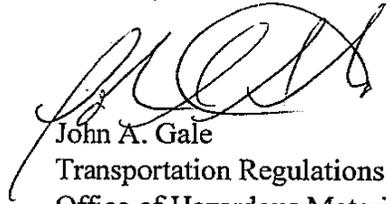
000356

RQ, Waste, Toxic solid, inorganic, n.o.s., (Lead sulfate, Silver chloride), 6.1, UN 3288,
PG II, (D008)

Waste, Toxic solid, inorganic, n.o.s., (Lead sulfate, Silver chloride), 6.1, UN 3288, PG II,
RQ, (D008)

I hope this answers your inquiry.

Sincerely,

A handwritten signature in black ink, appearing to read 'John A. Gale', written over a horizontal line.

John A. Gale
Transportation Regulations Specialist
Office of Hazardous Materials Standards



1501 WASHINGTON STREET, P.O. BOX 859048, BRAINTREE, MA 02185-9048
(781) 849-1800

Visit our Website at www.cleanharbors.com

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§ 172.202
§ 172.203(c)(2)
Shipping Papers
00-0356

December 13, 2000

Mr. Edward Mazzullo
Director, Office of Hazardous Material Standard
USDOT – RSPA (DHM 10)
400 Seventh Street SW
Washington DC 20590-0001

Dear Mr. Mazzullo:

Clean Harbors Environmental Services, Inc. (CHESI) is writing this letter requesting an interpretation of 49 CFR 172.202 and 172.203(c)(2) regarding information allowed in a shipping description.

As stated in 49 CFR 172.202(b) the basic shipping description, the name, the hazard class, the ID number and the packing group must be shown in the sequence with no additional information interspersed.

Under 49 CFR 172.203(c) it is stated if the proper shipping name for a material that is a hazardous substance does not identify the hazardous substance by name, the name of the hazardous substance must be entered in parentheses in association with the basic description. For hazardous waste, the waste code (e.g. D001) if appropriate, may be used to identify the hazardous substance.

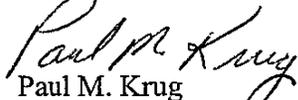
Under 49 CFR 172.203©(2) it is stated the letters "RQ" shall be entered on the shipping paper either before or after, the basic description required by 49 CFR 172.202.

CHESI is requesting interpretation from your office for the correct sequence shipping description to be entered on a Hazardous Waste Manifest that requires an RQ. The following are examples of various shipping descriptions that CHESI could apply to a manifest: RQ, (D009) Waste Mercury, UN 2809, PGIII or should it be entered as Waste, Mercury, 8 UN 2809, PG III (RQ D009). Another example is RQ, (D008) Waste Toxic solid, inorganic, n.o.s. 6.1, UN3288, PG II (Lead sulfate, Silver chloride), or RQ, Waste Toxic solid, inorganic, n.o.s. 6.1, UN3288, PG II (Lead sulfate, Silver chloride)(D008) and finally RQ, Waste Toxic solid, inorganic, n.o.s. (Lead sulfate, Silver chloride) 6.1, UN3288, PG II (D008).

When entering additional information like the letters RQ and or the word Waste, is this type of information consider part of the sequence of a shipping description?

If any additional information is required or I can be of further assistance, please do not hesitate to contact me at (781) 849-1800 ext. 4213.

Sincerely,

A handwritten signature in cursive script that reads "Paul M. Krug". The signature is written in black ink and is positioned above the printed name.

Paul M. Krug

Manager, Transportation Compliance