



U.S. Department  
of Transportation

**Research and  
Special Programs  
Administration**

AUG 20 2001

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

Mr. Eugene Y. Ngai  
Vice President Corporate  
Development and Technology  
Solkatronic Chemicals  
351 Philadelphia Avenue  
Morrisville, PA 19067

Ref. No. 01-0169

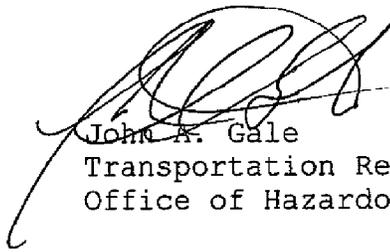
Dear Mr. Ngai:

This is in response to your letter dated June 29, 2001, requesting clarification of labeling requirements under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if the empty label required under § 173.428 for an empty radioactive material package may be used for a cleaned and purged packaging that formerly contained a non-radioactive hazardous material.

The answer is yes. A shipper may apply the empty label depicted in § 172.450 to an empty packaging that formerly contained a hazardous material of any hazard class.

I hope this satisfies your request.

Sincerely,



John A. Gale

Transportation Regulations Specialist  
Office of Hazardous Materials Standards



01-0169

173.428



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June 29, 2001

BAH  
§173.428  
Labeling  
01-0169

Mr. David Clark  
US Department of Transportation  
820 Bear Tavern Road  
Suite 306  
West Trenton, NJ 08628

Dear Mr. Clark:

The US Transportation Regulations under 49CFR173.428 mandates the use of an empty label for radioactives. Can this same label be used for cylinders that have been cleaned and purged of their contents? Or is its use restricted only to radioactives?

We have been using these labels to indicate empty cylinders as defined under 173.29.

Sincerely,

Eugene Y. Ngai  
Vice President Corporate  
Development & Technology

