



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

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

AUG 16 2001

Mr. Simone A. Yearwood
Aceto Corporation
One Hollow Lane
Lake Success, NY 11042-1215

Ref. No. 01-0198

Dear Mr. Yearwood:

This is in response to your July 23, 2001 letter concerning marking UN specification drums under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you wish to ship Pyridine in incorrectly marked UN specification drums.

You may not transport Pyridine in incorrectly marked UN packagings. However, you may correct the UN specification marking (in this case, changing the "Z" marking to a "Y" marking) if you possess the valid test results that indicate the drum meets the "Y" specification criteria. Since your company is a different company than the company that originally marked the drums, you may not use the symbol representing the original company unless specific permission and arrangements, such as a written agreement, exist between your company and the original company. Enclosed is a previously issued letter from this Office that further clarifies the UN marking requirements.

I hope this satisfies your request.

Sincerely,



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

Enclosure



01-0198

178.503



ACETO CORPORATION

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July 23, 2001

Edward Mazzullo
Director of OHMS
US DOT/RSPA (DH-10)
400 7th Street, S.W.
Washington, DC 20590

Dear Mr. Mazzullo:

Aceto Corporation requests that the OHMS confirm, in writing, that we are permitted to transport Pyridine received from India in incorrectly marked UN-Approved drums. The drum manufacturing company mistakenly marked the drums with "Z" instead of "Y". Aceto has documentation from our supplier, the drum manufacturer, and also the regulatory agency in India that approves UN-Approved packaging that these drums have met the criteria for shipment of Pyridine (pkg. II) and have incorrectly marked.

Aceto Corporation will have copies of these documents accompany the shipments of these drums. Aceto will also correctly label these drums with the appropriate UN-Approved DOT markings.

If you have any questions, please feel free to contact me at (516) 627-6000 ext.252

Best Regards,

Simone A. Yearwood
Regulatory Affairs Specialist
ACETO CORPORATION

Johnsen
§ 178.503
Packaging Markings
01-0198