

Mar 21, 2003

Mr. Raymond T. Duzynski
Regulatory Analyst
3M General Office
3M Center
St. Paul, MN 55144-1000

Reference No. 02-0201

Dear Mr. Duzynski:

This responds to your July 23, 2002 letter requesting an interpretation of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to shipping papers. Specifically you ask if it is necessary to remove the letters "RQ" and the name of the hazardous substance(s) from the shipping paper for the return trip of a bulk package other than a tank car when the residue in the package no longer meets the definition of a hazardous substance and the phrase "RESIDUE: Last Contained ***" does not appear on the shipping paper before the basic description.

The answer is no. In accordance with § 172.203(e)(2), the description on the shipping paper for a tank car containing the residue of a hazardous material must include the phrase "Residue: Last Contained ***" before the basic description. If, when fully loaded, the correct shipping description for the material in the tank car required the letters "RQ" to be included, the letters "RQ" are not required to be removed from the shipping paper description when the residue in the tank car no longer meets the definition of a hazardous substance.

I hope this information is helpful. If we can be of further assistance, do not hesitate to contact us.

Sincerely,

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

172.203(e)(2)