



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

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

APR 16 2003

Ms. Anita S. Knight  
Corporate Regulatory Biologist  
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Naperville, IL 60563-1198

Ref. No. 03-0079

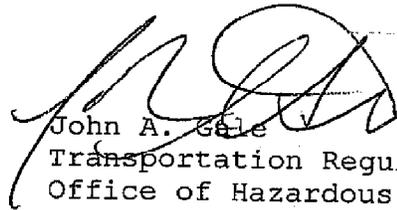
Dear Ms. Knight:

This is in response to your March 14, 2003 letter and subsequent telephone conversation with a member of my staff requesting clarification of the provisions in § 172.203(c) and (k) of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if the technical name and name identifying the hazardous substance may be listed on the shipping paper in the same set of parentheses.

The answer is yes. Technical names and the names representing hazardous substances may be placed in a single set of parentheses. Section 172.203(c) and (k) require the name identifying the hazardous substance, if not identified by the proper shipping name, and the technical name to be entered in parentheses in association with the basic description.

I hope this satisfies your request.

Sincerely,



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



030079

172.203



BAH  
 § 172.202  
 § 172.203  
 Shipping Papers  
 03-0079

March 14, 2003

Mr. Edward T. Mazzullo  
 Directory, Office of Hazardous Materials Standards  
 U.S. DOT/RSPA (DHM-10)  
 400 7<sup>th</sup> Street S.W.  
 Washington, D.C. 20590-0001

Subject: 49CFR 172.203 (c)(2), Additional Description Requirements

Dear Mr. Mazzullo:

Please confirm the format for including a hazardous substance in the basic description on a shipping paper. According to 49 CFR 172.203:

(1) Except for Class 7 (radioactive) materials described in accordance with paragraph (d) of this section, 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. If the material contains two or more hazardous substances, at least two hazardous substances, including the two with the lowest reportable quantities (RQs), must be identified. For a hazardous waste, the waste code (e.g., D001), if appropriate, may be used to identify the hazardous substance.

(2) The letters "RQ" shall be entered on the shipping paper either before or after, the basic description required by §172.202 for each hazardous substance (see definition in §171.8 of this subchapter). For example: "RQ, Allyl alcohol, 6.1, UN 1098, I"; or "Environmentally hazardous substance, solid, n.o.s., 9, UN 3077, III, RQ (Adipic acid)".

Specifically, does "in parentheses in association with the basic description" mean the RQ component can be included in the same parentheses as the hazardous component(s) contained in the hazardous material? Or must the hazardous substance be separated from the rest of the description and listed in separate parentheses at the end? The examples above in 172.203(c) (2) and in several previous letters of interpretation do not include the circumstances that we usually encounter. For example, is it wrong to print the shipping description with the RQ for naphthalene per the following? This would seem to meet the criterion of following the "basic description in any reasonable format provided it is clearly part of the entry", as DOT has qualified in other letters of interpretation on this section.

**RQ Flammable liquid, n.o.s.**

**(contains isopropanol, petroleum distillate, naphthalene) 3 UN1993 PG II**

Thank you for your prompt response.

Yours truly,

Anita S. Knight  
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 Environment, Health & Safety Department  
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SVEZ

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