



U.S. Department  
of Transportation  
**Pipeline and  
Hazardous Materials Safety  
Administration**

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

FEB 27 2006

Mr. Randy Porter  
7000 East Avenue  
Airgas, Inc.  
Livermore, CA 94551

Ref. No.: 05-0310

Dear Mr. Porter

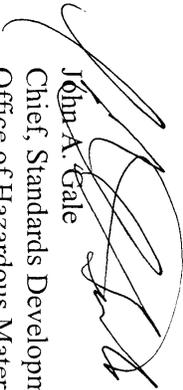
This is in response to your letter requesting clarification of the packaging and marking requirements for the transportation of radioactive materials under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). You indicate that you are shipping a Type A quantity of non-fissile radioactive material in a Type B package.

In order to make the shipment you may:

1. Use a Type B packaging for the transportation of a Type A<sub>1</sub> or A<sub>2</sub> quantity of material (§ 173.415(c)). However, you must select a proper shipping name indicating that the material is in a Type B packaging. In addition, you should include the isotope on the shipping paper and an indication that the Type B packaging contains a Type A quantity of material; or
2. Use a Type B packaging as a Type A packaging. This requires you to convert a Type B packaging to a Type A packaging by removing or covering all markings (including the specification plate) used to indicate that it is a Type B packaging and replacing them with the appropriate Type A markings. In addition, the Type A packaging is a new design and must be certified as meeting the Type A requirements.

I hope this information is helpful. Please contact us if you require additional assistance.

Sincerely,

  
John A. Gale

Chief, Standards Development  
Office of Hazardous Materials Standards



050310

173.415(c)

**Nickels, Matthew <PHMSA>**

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**From:** Randy D. Porter [porter4@lhl.gov]  
**Sent:** Tuesday, December 06, 2005 2:28 PM  
**To:** INFOCNTR <PHMSA>  
**Subject:** Type A Quantity in Type B

*SUPKO  
\$173,415(a)  
Packages  
D5-0310*

I am shipping a Type A quantity in a Type B Package. Do I ship it as Type A or Type B, if I ship as Type A how do I mark the outside of the package. DOE/RL-96-57, Vol. 1, Chapter 1.0, 1.4 Use of Type B packaging states ("Identification markings should be covered and new marking ("USA DOT-7A TYPE A" and "radioactive material") affixed to the package, pursuant to 49 CFR 173.415(a) . Is this the correct method for my shipment?

Thank you  
Randy Porter  
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