



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

AUG 8 2006

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

Mr. Peter Olsen
Transportation Systems Solutions
318 Hampshire Lane
Crystal Lake, Illinois 60014

Ref. No. 06-0154

Dear Mr. Olsen:

This is in response to your June 27, 2006 letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 100-180) applicable to marking requirements for portable tanks. Specifically, you ask whether a portable tank marked with a proper shipping name of a hazardous material must also be marked with the United Nations (UN) identification number. In addition, you request a CFR citation that specifies the size of the marking of a proper shipping name on portable tanks. You further ask whether these requirements are applicable to all portable tanks transporting hazardous materials.

As required in § 172.326, a portable tank containing a hazardous material must be legibly marked on two opposing sides with the proper shipping name specified for the material in the § 172.101 Hazardous Materials Table (HMT). In addition, the name of the owner or of the lessee, if applicable, must be displayed on a portable tank that contains a hazardous material. As provided in § 172.302, markings must have a width of at least 4.0 mm (0.16 in) and a height of at least 25 mm (one inch) for portable tanks with capacities of less than 3,785 L (1,000 gallons). Markings on portable tanks with a capacity greater than 3,785 L (1,000 gallons) must have a width of at least 6.0 mm (0.24 inch) and a height of at least 50 mm (2.0 inches).

In addition, as required in § 172.302, a bulk packaging must be marked as required by § 172.332 with the identification number specified for the material in the HMT on each side and each end, if the packaging has a capacity of 3,785 L (1,000 gallons) or more; or on two opposing sides, if the packaging has a capacity of less than 3,785 L (1,000 gallons).

I trust this satisfies your inquiry.

Sincerely,

John A. Gale
Chief, Standards Development
Office of Hazardous Materials Standards



060154

172.302
172.326



Transportation Systems Solutions

Foster
§172.326
Markings of Portable
Tanks
66-0154

318 Hampshire Lane
Crystal Lake
Illinois, 60014
815-479-0897

U.S Department of Transportation
Pipeline and Hazardous Materials Safety Administration
Office of Hazardous Materials Safety
400 7th St S.W
Washington, DC 20590-0001

Dear Sir/Madam,

Transportation Systems Solutions (TSS) respectfully seeks an interpretation as to the marking requirements of a portable tank. 49 CFR 172.326 states that a portable tank must be marked on two opposing sides with the proper shipping name for the hazardous material. Is the requirement of the proper shipping name on two opposing sides of the portable tank in addition to the UN Identification number on the placards and if so is this requirement applicable to all hazardous materials shipped in portable tanks?

If the proper shipping name being affixed to two opposing sides of a portable tank is applicable to all hazardous material shipments in portable tanks can you please provide the dimensions of the lettering and also the reference in 49 CFR for this lettering size?

I thank you for your assistance in this matter and look forward to your response.

Yours Truly,


Peter Olsen
TSS