

<u>SUBJECT</u>		<u>DATE</u>
1188. RCRA Empty Containers vs. TSCA PCB Decontaminated Containers - Scenario II	ENCORE	AUG 11, 2016
1189. RCRA Empty Containers vs. TSCA PCB Decontaminated Containers - Scenario III	ENCORE	AUG 18, 2016
1190. Product Spills and Waste Determinations	ENCORE	AUG 25, 2016
1191. Product Spills, Waste Determinations, and LDR	ENCORE	SEP 1, 2016
1192. Regulatory Status of Caustic Rinse Waters Contaminated with Trace Solvents	ENCORE	SEP 8, 2016
1193. Regulatory Status of Sand Blast Grit Contaminated with Trace Listed Solvents	ENCORE	SEP 15, 2016
1194. Hazardous Waste "F" Listings and Trace Contamination	ENCORE	SEP 22, 2016
1195. Hazardous Waste "F" Listings and Trace Contamination – Again!	ENCORE	SEP 29, 2016
1196. Hazardous Waste Determinations and Phase Separation		OCT 6, 2016
1197. Asbestos and DOT Relief	ENCORE	OCT 13, 2016
1198. PCB Containers and Concentration of PCBs	ENCORE	OCT 20, 2016
1199. PCB Analytical Waste Disposal Requirements	ENCORE	OCT 27, 2016
1200. PCB Analytical Waste Disposal Requirements – Water vs. Organic Liquids and Non-aqueous Inorganic Liquids		NOV 3, 2016
1201. Listed Waste Codes and Pre-RCRA Wastes	ENCORE	NOV 10, 2016
1202. Purpose of the <90-day Hazardous Waste Accumulation Exemption		NOV 17, 2016
1203. Used Oil Eligibility for Turkey and Ham Oils	ENCORE	NOV 23, 2016
1204. PCB Reporting and Recordkeeping Relief	ENCORE	DEC 1, 2016
1205. Defining Criteria for Household Waste Exclusion	ENCORE	DEC 8, 2016
1206. The Household Waste Exclusion and Renovation Debris	ENCORE	DEC 15, 2016
1207. 'Twas the Night before Christmas – The Twenty-Fourth Annual Edition		DEC 24, 2016
1208. The Household Waste Exclusion and Renovation Debris – Part II	ENCORE	DEC 29, 2016
1209. Absorbent Additions and Treatment		JAN 5, 2017
1210. Frozen RCRA Wastewater - DOT Liquid or Solid When Manifested?	ENCORE	JAN 12, 2017
1211. DOT Marking Specifications for the "UN", "NA" and "ID" Markings		JAN 19, 2017

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## TWO MINUTE TRAINING

**TO:** CH2M HILL PLATEAU REMEDIATION COMPANY

**FROM:** PAUL W. MARTIN, RCRA Subject Matter Expert  
CHPRC Environmental Protection, Hanford, WA

**SUBJECT:** DOT MARKING SPECIFICATIONS FOR THE “UN”, “NA” AND “ID” MARKINGS

**DATE:** JANUARY 19, 2017

<u>CHPRC Projects</u>	<u>CH PRC - Env. Protection</u>	<u>MSA</u>	<u>Hanford Laboratories</u>	<u>Other Hanford Contractors</u>	<u>Other Hanford Contractors</u>
Richard Austin Roni Ashley Tania Bates Rene Catlow Richard Clinton Larry Cole John Dent Brian Dixon Eric Erpenbeck Stuart Hildreth Mike Jennings Stephanie Johansen Jeanne Kisielnicki Melvin Lakes Jim McGrogan Stuart Mortensen Dean Nester Dave Richards Phil Sheely Connie Simiele Jennie Stults Jeff Westcott Jeff Widney	Ron Brunke Bill Cox Laura Cusack Lorna Dittmer Ted Hopkins Sasa Kosjerina Jim Leary Rick Oldham Anthony Nagel Linda Petersen Fred Ruck Ray Swenson Wayne Toebe Daniel Turlington Dave Watson Joel Williams	Brett Barnes Jerry Cammann Jeff Ehlis Garin Erickson Panfilo Gonzales Jr. Dashia Huff Mark Kamberg Edwin Lamm Candice Marple Jon McKibben Saul Martinez Jon Perry Christina Robison Lana Strickling Lou Upton	(TBD)  <u>DOE RL, ORP, WIPP</u>  Mary Beth Burandt Duane Carter Cliff Clark Tony McKarns Ellen Mattlin Greg Sinton Scott Stubblebine	Bill Bachmann Dean Baker Scott Baker Lucinda Borneman Paul Crane Tina Crane Jeff DeLine Ron Del Mar John Dorian Mark Ellefson Darrin Faulk Joe Fritts Lori Fritz Tom Gilmore Rob Gregory Gene Grohs James Hamilton Andy Hobbs Ryan Johnson Dan Kimball Megan Lerchen Richard Lipinski Charles (Mike) Lowery Michael Madison Terri Mars Cary Martin Marty Martin Grant McCalmant Steve Metzger Tony Miskho Matt Mills Tom Moon Chuck Mulkey Mandy Pascual Kirk Peterson	Jean Quigley Dan Saueressig Merrie Schilperoort Joelle Moss Glen Triner Greg Varljen Julie Waddoups Jay Warwick Kyle Webster Ted Wooley

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## TWO MINUTE TRAINING

**SUBJECT:** DOT Marking Specifications for the “UN”, “NA” and “ID” Markings

**Q:** A customer has two non-bulk containers of hazardous waste scheduled for shipment to an offsite TSDF in late January 2017. The customer notices that the DOT marking for the “UN1263” number is a different size on the two containers, i.e., one container has a UN marking that is only about ¼-inch tall but the other marking is almost ½-inch tall. Is this an issue?

**A:** According to [49 CFR 172.301](#)(a), “Proper shipping name and identification number”, paragraph (1), it basically states that a non-bulk packaging must be marked with the proper shipping name and UN, NA, or ID identification number as appropriate for the material as shown in the DOT Hazardous Materials Table (HMT). The identification numbers must be marked in characters at least 12 mm (0.47 inches) high. Packages of 8 gallons or less, 66 pounds or less, or cylinders of 16 gallons or less must be marked with characters at least 6 mm (0.24 inches) high. Smaller packages with a maximum capacity of 5 liters (1.32 gallons) or 5 kg (11 pounds) or less must be marked in a size appropriate for the size of the package. Also, packages that have been permanently marked with an identification number prior to January 1, 2017, e.g., embossing or heat stamp, may be used until the end of their useful life regardless of marking size.

49 CFR 172.301(a)(1)(i) states that for domestic transportation, the identification markings are not subject to the minimum size requirements until January 1, 2017.

A search of past 49 CFR Federal Registers indicates that this change was effective on January 1, 2013, and was published in the Federal Register on [January 7, 2013](#), page 1072. Preamble discussion is on page 1008.

See the [2012](#) and [2013](#) versions of 49 CFR 172.301 to compare wording.

Note that there is no minimum size requirement for other package marking requirements, e.g., proper shipping names, technical names, etc. This is clarified in a DOT interpretation letter dated January 16, 2015 ([DMS ID# 14-0228](#)).

Therefore, the customer does have an issue and would have to correct the UN marking size on the container with the ¼-inch tall lettering, unless the package meets a size exceptions, or is permanently marked.

### SUMMARY:

- The UN, NA or ID number is required to be marked on the customer’s non-bulk packagings.
- Prior to January 1, 2013, the identification marking was not subject to a minimum size.
- After January 1, 2017, the identification marking must be at least 12 mm high, i.e., 0.47 inches, unless certain exemptions apply for package size or permanent package markings.

Excerpts from 49 CFR 172.301 (2012 vs. 2013) and the DOT interpretation letter are attached to the e-mail. If you have any questions, please contact me at [Paul\\_W\\_Martin@rl.gov](mailto:Paul_W_Martin@rl.gov) or at (509) 376-6620.

**FROM:** Paul W. Martin

**DATE:** 1/19/17

**FILE:** 2MT\2017\011917.rtf

**PG:** 1

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## TWO MINUTE TRAINING - ATTACHMENT

**SUBJECT:** DOT Marking Specifications for the “UN”, “NA” and “ID” Markings

**YEAR 2012**

### **49 CFR § 172.301 General marking requirements for non-bulk packagings.**

(a) *Proper shipping name and identification number.*

(1) Except as otherwise provided by this subchapter, each person who offers a hazardous material for transportation in a non-bulk packaging must mark the package with the proper shipping name and identification number (preceded by “UN”, “NA” or “ID,” as appropriate) for the material as shown in the § 172.101 Table.

**YEAR 2013 to Present**

### **49 CFR § 172.301 General marking requirements for non-bulk packagings.**

(a) *Proper shipping name and identification number.* (1) Except as otherwise provided by this subchapter, each person who offers a hazardous material for transportation in a non-bulk packaging must mark the package with the proper shipping name and identification number (preceded by “UN”, “NA” or “ID,” as appropriate) for the material as shown in the § 172.101 Hazardous Materials Table. The identification number marking preceded by “UN”, “NA”, or “ID” as appropriate must be marked in characters at least 12 mm (0.47 inches) high. Packages with a maximum capacity of 30 liters (8 gallons) or less, 30 kg (66 pounds) maximum net mass, or cylinders with a water capacity of 60 liters (16 gallons) or less must be marked with characters at least 6 mm (0.24 inches) high. Packages with a maximum capacity of 5 liters (1.32 gallons) or 5 kg (11 pounds) or less must be marked in a size appropriate for the size of the package.

(i) *Transitional exception.* For domestic transportation, until January 1, 2017, the identification number markings are not subject to the minimum size requirements specified in paragraph this (a)(1).

(ii) Exception for permanently marked packagings. For domestic transportation, a packaging manufactured prior to January 1, 2017 and permanently marked (e.g., by embossing or through a heat stamp process) with the appropriate identification number marking may continue in service until the end of its useful life regardless of whether the identification number markings meet the minimum size requirements specified in this paragraph (a)(1).

**FROM:** Paul W. Martin

**DATE:** 1/19/17

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## TWO MINUTE TRAINING - ATTACHMENT

**SUBJECT:** DOT Marking Specifications for the “UN”, “NA” and “ID” Markings

January 16, 2015

Mr. Andrew Romach  
Regulatory Compliance Manager  
URS Corporation  
1600 Perimeter Park Drive  
Morrisville, NC 27560

Reference No. 14-0228

Dear Mr. Romach:

This is in response to your November 19, 2014 letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the proper shipping name marking size for IBCs that are labeled instead of placarded. Specifically, in the case of an IBC labeled in accordance with § 172.514(c), you ask if a proper shipping name with a height of 6 mm and a UN identification number with a height of 12 mm displayed adjacent to the hazard label is authorized.

The answer is yes. Section 172.336(d) provides a special provision for the display of identification numbers that permits a bulk packaging that is labeled instead of placarded in accordance with 172.514(c) to display identification number markings consistent with the requirements of § 172.301(a)(1). Section 172.301(a)(1) prescribes a 12 mm minimum height requirement for the identification number for an IBC; however, a minimum height for the proper shipping name is not prescribed. In addition, a transitional exception provided in § 172.301(a)(1)(i) prescribes that for domestic transportation, until January 1, 2017, identification number markings are not subject to the 12 mm minimum height requirement.

I trust this information is helpful. If you have further questions, please do not hesitate to contact this office.

Sincerely,

Shane C. Kelley  
Acting International Standards Coordinator  
Standards and Rulemaking Division

**FROM:** Paul W. Martin

**DATE:** 1/19/17

**FILE:** 2MT\2017\011917.rtf

**PG:** 3

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