

Transportation/Hazardous Materials: Pipeline and Hazardous Materials Safety Administration Interpretive Letter Addressing Packaging



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The Pipeline and Hazardous Materials Safety Administration (“PHMSA”) addressed in a July 16th Interpretive Letter the application of the federal Hazardous Materials Regulations (“HMR”) applicable to:

...the size of a specification marking for a combination packaging that is comprised of multiple inner packagings (plastic jerricans (3H1)) in an outer packaging (fiberboard box (4G)).

See reference no. 24-0027.

PHMSA was responding to April 17th correspondence from Benjamin Frankowski with Agricultural Solutions North America (“ASNA”).

ASNA had stated that the referenced outer packaging has a cubic volume that is greater than 30 L and the combined volume of the inner packaging is less than 30 L.

The question posed is whether the minimum required size of a United Nations (“U.N.”) specification marking (as specified in 49 C.F.R. 178.3(a)(4)) is based upon the volume of the outer packaging or that of the combined volume of the inner packaging.

PHMSA responds in the July 16th letter that for combination packagings, the minimum size standard for letters and numerals that make up the specification marking applies to the capacity of the outer packaging. This conclusion is stated to apply regardless of whether the inner packagings used in the combination packaging are also U.N. specification packagings or whether the combined capacity of the inner packagings is less than 30 L.

A copy of the letter can be downloaded [here](#).