



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, D.C. 20590

FEB 27 2014

Ms. Georgia Barr  
SC Johnson & Son, Inc.  
1525 Howe Street  
Racine, WI 53403-5011

Ref. No. 13-0169R

Dear Ms. Barr:

This is in reference to PHMSA's response to your request for interpretation Ref. No. 13-0169 of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) issued on October 23, 2013. After further consideration, Ref. No. 13-0169 has been superseded by this revised letter.

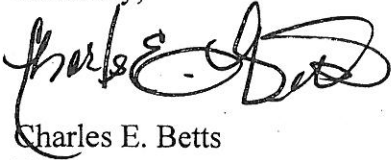
In your original letter you requested clarification of the § 172.315(a)(2) size requirements for the limited quantity marking for ground shipments. Specifically, you noted that, in order to: (1) meet customer requests for structural perforations and graphics; (2) satisfy production, warehousing, and other governmental requirements for display of information (e.g., bar codes) on the packaging; and (3) satisfy the § 172.304 marking requirements, the limited quantity marking on your packagings would need to be 80 mm on each side. Additionally, you provided illustrations of these retail packagings.

PHMSA has clarified our position in the October 23, 2013 letter. Section 172.315(a)(2) requires the limited quantity marking to be durable, legible, and of a size relative to the package that is readily visible and that the dimensions of the square-on-point marking must be 100 mm on each side unless the packaging size requires a reduced size marking (which, then must be no less than 50 mm on each side).

Section 172.315(a)(2) specifically states that the limited quantity marking may only be reduced if the packaging size requires a reduced marking. It is the opinion of this office that the marking size may not be reduced to less than the 100 mm per side standard to accommodate pre-printing of additional information such as structural perforations and graphics. The marking size may only be reduced to less than the 100 mm per side standard (but not less than 50 mm) when the size of the packaging physically precludes the 100 mm per side standard marking from fitting (i.e. no side of the packaging is large enough to contain the full sized marking).

We understand that this revised position may affect pre-printed packagings and ask that you contact your regional PHMSA field operations office at (847) 294-8580 to determine how to address any unused packaging inventory. If you have further questions, please contact this office.

Sincerely,

A handwritten signature in black ink, appearing to read "Charles E. Betts". The signature is written in a cursive style with a large, stylized initial "C".

Charles E. Betts  
Director,  
Standards and Rulemaking Division

172.315, 172.304