



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

1200 New Jersey Avenue, SE
Washington, DC 20590

July 16, 2024

Benjamin Frankowski
Senior Packaging Engineer
Agricultural Solutions North America (N-APN/PP)
BASF Corporation
2 TW Alexander Drive
Research Triangle Park, NC 27709

Reference No. 24-0027

Dear Mr. Frankowski:

This letter is in response to your April 17, 2024, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the size of a specification marking for a combination packaging that is comprised of multiple inner packagings (plastic jerricans (3H1)) and an outer packaging (fiberboard box (4G)). You state that the outer packaging has a cubic volume that is greater than 30 L and the combined volume of the inner packaging(s) is less than 30 L. Specifically, you ask whether the minimum required size of a United Nations (UN) specification marking—as specified in § 178.3(a)(4)—is based on the volume of the outer packaging or that of the combined volume of the inner packaging(s).

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. Note that this applies regardless of whether the inner packagings used in the combination packaging are also UN specification packagings or whether the combined capacity of the inner packagings is less than 30 L. Thus, based on the size of the outer packaging you indicated, the specification marking must be at least 12.0 mm (0.47 inches) in height.

I hope this information is helpful. Please contact us if we can be of further assistance.

Sincerely,

A handwritten signature in blue ink, appearing to read "Dirk Der Kinderen".

Dirk Der Kinderen
Chief, Standards Development Branch
Standards and Rulemaking Division

Casey

24-0027

From: [INFOCNTR \(PHMSA\)](#)
To: [Dodd, Alice \(PHMSA\)](#)
Cc: [Hazmat Interps](#)
Subject: FW: Interpretation Guidance 49CFR 178.3(a)(4)
Date: Monday, April 22, 2024 3:57:58 PM
Attachments: [image001.png](#)

Hi Alice,

Please see the below Interpretation Request.

Let me know if you need anything.

Regards,

-Breanna

From: Benjamin Frankowski <benjamin.frankowski@basf.com>
Sent: Wednesday, April 17, 2024 1:57 PM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Subject: Interpretation Guidance 49CFR 178.3(a)(4)

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Sir or Madam,

Could you please provide UN font size interpretation guidance on **49 CFR 178.3(a)(4)** in following scenario:

UN spec 4G combination package with multiple 3H1 inner packagings for a liquid.
The cubic LxWxH dimensions of the main packaging itself create a **>30L cubic volume**; the *actual* brimful liquid product capacity of the combined inner packagings is **<30L** .

Which volume shall be the 30L capacity threshold for the UN lettering size:

- a. >30L cubic volume of the main packaging (→12mm font size), or
- b. <= 30L combined inner packaging/brimful capacity (→6mm font size)

Thank you!

Best regards / Viele Grüße

Benjamin Frankowski

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