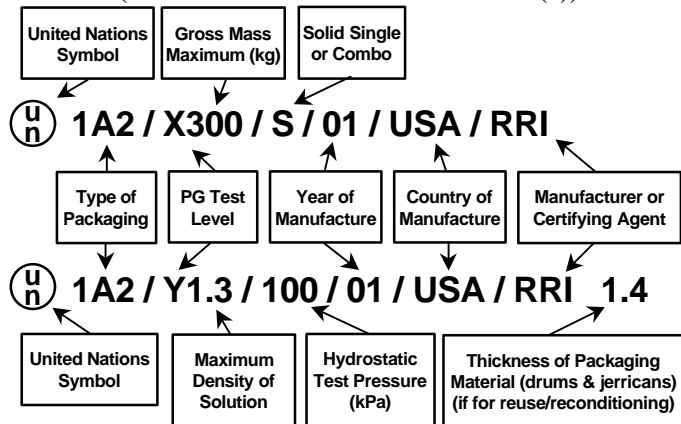




**HELLO READERS.** This issue of our **free** newsletter is heads-up concerning the improper certification marking of UN specification packagings – primarily drums and jerricans. The regular format of this newsletter will return next month. Remember, this newsletter is copyright protected. You may, however, forward it to others in whole and without any changes. Contact us to be added to the distribution.

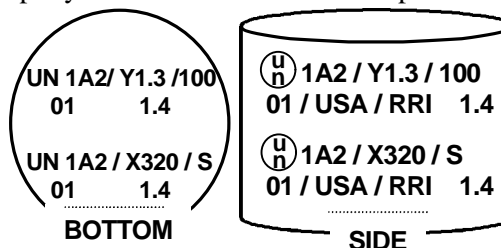
**DOT SPECIFIES** in 49 CFR 178.503 the UN certification (cert) marking requirements to be displayed on UN specification packagings. The marking of the cert on the package is the responsibility of the manufacturer (178.2, 178.3, 178.503). Use of a package displaying an improper cert marking is the fault of the shipper/offendor (173.22, 173.24). Proper UN cert markings contain the following elements (from 49 CFR 178.502 and 178.503(a)):



Note that the "1.4" in the example is only required if the packaging is to, or may be, reused or reconditioned. The UN cert marking must appear, in its entirety, on all UN specification packages. This applies to packages that are dual certified (i.e., single packaging certified for both liquid and solid contents); failure to display both certifications in their **entirety** is a technical **violation** of 178.3(c).

The UN cert marking that must appear on the package has to be placed on side or top of any package with a gross mass >30 kg (178.3(a)(5)). For new metal drums >100 L capacity, the UN marking which **must** also appear on the bottom of the package needs only to display the information in 178.503(a)(1)-(6), and if for reuse or reconditioning also (a)(9)(i). These UN cert markings must be placed on the package in a permanent manner (painting, using labels, etching, etc.). For metal drums authorized for reuse or reconditioning, the marking must be able to withstand the reconditioning process (e.g., embossed); in these cases, the UN symbol of 178.503(a)(1) may be displayed using the upper case letters "UN". In all other situations (i.e., other than metal

drum embossing), the UN symbol **must** be configured as it appears in 178.503(e) with **lower case** letters within a circle. The use of upper case "UN" letters in the circle display is unauthorized and a **violation** of 178.503(a)(1)! An example of a properly marked UN cert for a dual specification drum is:



Failure to properly display the correct and complete UN cert is a technical **violation**. Now shippers, listen; this is your decision. How this is viewed by each inspector is not known. Some may not concern themselves with this while other may take it literally to mean that the packaging spec is void, and hence, the packaging is no longer a UN specification package. I've heard both views expressed.

**WHAT CAN YOU DO?** First, call your packaging vendor. Make sure your bid specs include cert marking to 49 CFR 178.3 and 178.503. Until or unless RSPA relaxes these cert marking requirements, they must appear as required by the regulations. If the cert is correct except for display of upper case UN letters in the "symbol" rather than lower case, you can affix a permanent, correct UN symbol over the incorrect one. For larger problems, you may contact the packaging vendor to see if they will supply corrected, permanent cert markings for the side of the packages along with instructions and permission to affix the corrected cert markings. Do not attempt to fix the cert yourself unless you are prepared to put your name and address in the certification (or symbol if registered with DOT/RSPA) and have on file all necessary documents as required by 178.601(1). Another option for dual specification packagings: you may cover the unnecessary markings from one of the UN packaging certs so as to display one complete and correct UN packaging cert marking. Remember: (1) it's a violation if the cert marking does not agree with 178.3 and 178.503, (2) in most cases the cert marking is fixable; and (3) make sure your bid specs are right!

**GOOD NEWS.** We are soon (end of April) to offer a 2-day Packaging Operations Workshop targeted to the inspection and use of non-bulk packages. We'll cover the topics you need to ensure you are receiving the most from your non-bulk packaging operations. Contact us if you'd like to receive additional benefits by hosting this workshop at your site. Look for our seminar information in the March newsletter.