

Minnesota Commercial Truck and Passenger Regulations

Fact Sheet

Overpacks

An overpack, as defined in the Hazardous Materials Regulations in 49 Section CFR 171.8, is an enclosure that is used by a single consignor, to provide protection or convenience in handling of a package, or to consolidate two or more packages. Overpack authorizations and restrictions are found in 49 CFR Section 173.25. Each container in an overpack must be a package authorized for that hazardous material (HM) in the HMR. Overpack does not include a transport vehicle, freight container, or aircraft unit load device. The most common types of overpacks are shrink-wrapped pallets, or packages placed in a protective outer packaging such as a box or crate.

Each package in an overpack must be marked and labeled as required for the specific HM. Those markings include the proper shipping name, identification number, specification packaging codes, limited quantity marks, package orientation arrows, and any other marking required for the specific HM by the HMR. Required labels, including any subsidiary hazard labels required for a material by the HM table, must be displayed on the package as required. There are specific requirements for the marking and labeling of an overpack containing HM packages.

Marking of Shipping Names, ID Numbers and Display of Labels

Unless the required markings and labels representative of **each** HM package contained therein are visible, the overpack itself must be marked with the proper shipping name and identification number of each HM, and labeled with hazard class labels for each class contained therein. Package marking and labels must be clearly visible from the outside of the overpack, and unobscured by multiple layers of shrink wrap or other packaging material. Labels must be displayed on two sides or ends of an overpack having a volume of 1.8 m³ (64 cubic feet) or more.

Orientation Arrow Markings

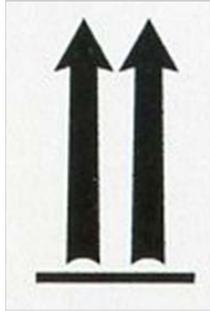
Overpacks containing packages subject to the orientation arrow markings in 49 CFR Section 172.312 must be marked with orientation arrows on two opposite vertical sides. This requirement is **in addition to** any orientation arrows displayed on individual packages that may be visible through shrink wrap. All containers with orientation arrows must be loaded in the overpack with the filling holes up.



Shrink-wrapped Pallet



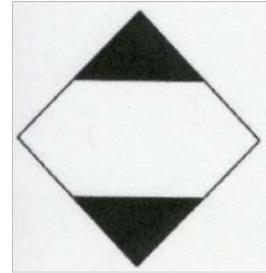
Fiberboard Box



Orientation Arrows



Overpack Mark on Pallet



Limited Quantity Mark

Display of the OVERPACK Mark

When an overpack contains *specification* packages, the word “OVERPACK” must be marked on the overpack, unless the package specification code markings representative of each different specification package contained in the overpack is clearly visible. NOTE: Many times, package specification codes are obscured or covered by shrink wrap or other packaging material. If non-specification packages are transported, the OVERPACK mark is not required. Overpacks containing packages of Limited Quantity materials marked with the new Limited Quantities mark (see 49 CFR Section 172.315) must be marked OVERPACK unless the Limited Quantities mark is visible on the packages.

Additional Overpack Authorizations and Restrictions

- Class 8 (corrosive) Packing Group I materials, and Division 5.1 (Oxidizing) Packing Group I materials may not be overpacked with any other materials.
- Shrink-wrapped or stretch-wrapped trays may be used as outer packaging for inner packaging prepared in conformance with Limited Quantity or ORM-D Consumer Commodity exceptions if:
 - Inner packaging are not fragile, liable to break or be punctured, for example: glass, porcelain, stoneware, or certain plastics; and
 - Each complete package does not exceed 20 kg (44 lbs.).
- HM required to be labeled POISON may be transported in the same motor vehicle with materials known to be foodstuffs, animal feed, or any edible material intended for consumption by humans or animals, *only when* that the poison material is:
 - Packaged, marked and labeled as required in the HMR;
 - Conforms to the overpack provisions of 49 CFR Section 173.25(a) and is overpacked as required in 49 CFR Section 177.841(e); or
 - Is overpacked in a UN 1A2, 1B2, or 1N2 drum tested and marked to Packing Group I or II performance levels.
- Overpack requirements for Class 7 radioactive materials are found in 49 CFR Part 178, subp. K.
- See 49 CFR Section 173.4(g)(3) for Excepted Package marking requirements.

Note: This fact sheet covers overpack requirements for highway transportation; additional requirements or restrictions may apply for specific materials or overpacked materials transported by aircraft or other modes. Please consult the Hazardous Materials Regulations for complete information.

This Fact Sheet is intended as a resource. It is not intended to explain all the requirements of Minnesota or Federal law or regulations. For additional assistance contact the US DOT Pipeline and Hazardous Materials Safety Administration at 800-467-4922 or www.phmsa.dot.gov/hazmat, the Federal Motor Carrier Safety Administration at 651-291-6150 or www.fmcsa.dot.gov, or MnDOT's Office of Freight and Commercial Vehicle Operations at 651-215-6330.