

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 of hazardous materials. 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 in the HMR. Overpack does not include transport vehicles or freight containers. The most common types of overpacks are shrink-wrapped pallets, or hazmat packages placed in a protective outer packaging such as a box or crate.



Shrink-wrapped Pallet



Fiberboard Box

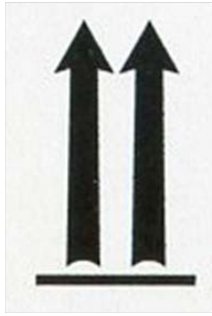
Each package in an overpack must be marked and labeled as required for the specific hazardous material. Required markings may include the proper shipping name, identification number, specification packaging codes, limited quantity marks, package orientation arrows, and any other marking required for the specific hazmat by the HMR. Required labels, including any subsidiary hazard labels required for a material by the hazmat table, must be displayed as required. There are three primary categories of overpack marking; each has different requirements.

Marking of Shipping Names, ID Numbers and Display of Labels

Overpacks must be marked with the proper shipping names and identification numbers, and labeled with hazard class labels, for each hazardous material contained therein, when hazard markings and labels on the packages in the overpack are not visible because of package configuration. However, if required marking and labels, representing each hazardous material in the overpack, are clearly visible on the packages, the overpack does not have to be marked and labeled. For example, overpack marking and labeling is not required if hazard marks and labels representative of each hazardous material in the overpack are clearly visible from the outside, 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

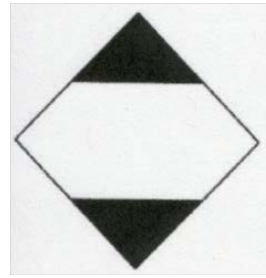
Overpacks containing packages subject to the orientation arrow markings in 49 CFR Section 172.312 must be marked with orientation arrows on two opposite vertical sides. This requirement is **in addition to** any orientation arrows displayed on individual packages that may be visible through shrink wrap.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



Orientation Arrows



Overpack Mark on Pallet



Limited Quantity Mark

Display of the OVERPACK Mark

49 CFR Section 173.25(a)(4) requires an overpack to be marked OVERPACK when the enclosure contains specification packages, unless the package specification code markings representative of each different specification package contained in the overpack are clearly visible through the 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. Until December 31, 2013, overpacks containing packages marked as ORM-D must be marked OVERPACK unless the ORM-D marking 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 packagings for inner packaging prepared in conformance with Limited Quantity or ORM-D Consumer Commodity exceptions if:
 - Inner packagings 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).
- Hazardous materials 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, provided that the 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.

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 <http://www.phmsa.dot.gov/hazmat>, the Federal Motor Carrier Safety Administration at 651-291-6150 or <http://www.fmcsa.dot.gov>, or Mn/DOT's Office of Freight and Commercial Vehicle Operations.



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