



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

June 3, 2024

Billy Murphy, Jr.
Safety & Compliance Manager
SBS Transportation, Inc.
1700 Wynne Ave.
St. Paul, MN 55108

Reference No. 23-0050

Dear Mr. Murphy:

This letter is in response to your May 12, 2023, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to shipping papers. In your email, you provide an example of a hazardous material description included in a shipping paper and ask whether other columns or information may be placed between the “HM” column and the basic description in accordance with § 172.201(a)(1)(iii).

The answer is no for additional information that is not specifically permitted or required by the HMR. The “X” is placed before the basic description in accordance with § 172.201(a)(1)(iii), however, we note in your example that there is additional information (e.g., “true” in an additional column labeled “pkg code”) interspersed between the “X” and the basic description that is not permitted or required before the basic description. Per § 172.201(a)(4), any such additional information must be placed after the basic description required by § 172.202. The hazardous material entry must be clearly and readily identifiable when described on the same shipping paper with materials not subject to the HMR. The basic description consisting of the identification number, proper shipping name, hazard class, and packing group, must be shown in proper sequence, as required in § 172.202(a) and (b). As stated in § 172.201(a)(1)(iii), the “X” must be placed in the “HM” column before the basic shipping description so as to clearly identify it as a hazardous material.

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

From: INFOCNTR (PHMSA)
To: Hazmat Interps
Subject: FW: Shipping Document Regulation Clarification
Date: Friday, May 19, 2023 1:27:59 PM
Attachments: image001.png

Hello,

Below is a request for letter of interpretation.

Thanks,
Jonathon

From: Billy Murphy Jr <bmurphyjr@sbstransportation.com>
Sent: Friday, May 12, 2023 9:19 AM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Cc: Michael Pastien <MPastien@sbstransportation.com>
Subject: Shipping Document Regulation Clarification

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.

Good morning PHMSA,

SBS Transportation is reviewing our system generated BOL templates. We are looking to confirm our BOL template complies with PHMSA/DOT shipping regulations. Specifically, 49 CFR 172.201(a)(1)(iii)

According to 49 CFR 172.201(a)(1)(iii), the "HM" column must be "before" the basic shipping description as shown below. Please confirm our interpretation meets the requirements under 49 CFR 172.201(a)(1)(iii).

H.M (X)	QTY	PKG CODE	PKG TYPE	COMMODITY DESCRIPTION	WEIGHT (LBS)	PART	PIECES	UNIT
X	2	True	Fiberboard Box	UN2794, Batteries, Wet Filled With Acid, 8	29.0	4014132-P	2	EA

Thank you for your time.



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