



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, DC 20590

May 1, 2024

Mr. Tom Bartfai  
Hazardous Materials Specialist, Motor Carrier & Rail Enforcement  
Public Utilities Commission of Ohio  
180 East Broad Street  
Columbus, OH 43215

Reference No. 24-0020

Dear Mr. Bartfai:

This letter is in response to your March 20, 2024, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to shipping papers. In your email, you note that when a shipping paper contains both hazardous and non-hazardous materials, shippers must differentiate between the two using at least one of the methods indicated in § 172.201(a)(1).

We have paraphrased and answered your questions as follows:

- Q1. Your incoming email and photo present a shipping paper which utilizes all three of the options listed in § 172.201(a)(1) simultaneously—i.e., the hazardous materials entries are entered first, the hazardous materials entries are identified by the entry of an “X” placed before the basic shipping description in a column captioned “HM”, and the hazardous materials basic shipping descriptions are highlighted. You ask whether—as shown in the photo—it is permissible to highlight more than just the basic shipping description.
- A1. The answer is yes, provided the additional highlighted information on the shipping paper is associated with—and is consistent with—the hazardous materials being shipped.
- Q2. If the highlight option in § 172.201(a)(1)(ii) is the only method used to differentiate between hazardous materials and non-hazardous materials on a shipping paper, you ask whether it is acceptable to highlight more than the basic description as seen in the photo you provided.

A2. Please see answer A1.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "S. Andrews". The signature is stylized and cursive.

Steven Andrews  
Acting Chief, Regulatory Review and Reinvention Branch  
Standards and Rulemaking Division

**Jones, Jessie Jane CTR (PHMSA)**

Pollack

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**From:** INFOCNTR (PHMSA)  
**Sent:** Thursday, March 21, 2024 1:29 PM  
**To:** Dodd, Alice (PHMSA)  
**Cc:** Hazmat Interps  
**Subject:** FW: Letter of Interpretation Request  
**Attachments:** OH3211303074-3.JPG

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Flagged

Hi Alice,

Please see the below interpretation request with the attached photo.

Let me know if you need anything.

Regards,

-Breanna

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**From:** thomas.bartfai@puco.ohio.gov <thomas.bartfai@puco.ohio.gov>  
**Sent:** Wednesday, March 20, 2024 9:37 AM  
**To:** INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>  
**Subject:** Letter of Interpretation Request

**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.**

Tom Bartfai  
180 E. Broad St.  
Columbus, OH 43215  
216-407-0352

To whom it may concern,

I'm writing to request a formal letter of interpretation in regards to 172.201(a)(1), specifically the applicability of 172.201(a)(1)(ii).

Question #1: If a shipper utilizes all 3 of the options listed in 172.201(a)(1) to what extent can items be highlighted per 172.201(a)(1)(ii)? Please look at the attached photo of a bill of lading taken during a recent roadside inspection. The shipper, actually the carrier in this instance prepared and offered the BOL for transportation. All hazardous materials are listed first; they all also have an "X" in the HM column. The second option listed is also utilized by highlighting information. As the photo shows, items other than the basic description are highlighted. When 2 options are done correctly; is it permissible to highlight more than the basic description as specified in 172.201(a)(1)(ii)? The regulation reads that only 172.202(a)(1), (2), (3), and (4) specific to the basic description are permitted to be highlighted.

Question #2: If only the 172.202(a)(1)(ii) highlight option is used in preparation of the BOL is it acceptable to highlight more than the basic description as specifically stated?

Thank you for help,

Tom Bartfai



Tom Bartfai  
Hazardous Materials Specialist  
Transportation Department  
Motor Carrier & Rail Enforcement  
FRA Certified  
216-407-0352  
[thomas.bartfai@puco.ohio.gov](mailto:thomas.bartfai@puco.ohio.gov)





RTL UUUUUU Seal#: 24242362

WIL

Manifest#: 55278672

Trailer: SF2287 (1/1)

NBG

Consignee : R+L CARRIERS WILMINGTON., OH  
 Address : 600 GILLAM RD  
 WILMINGTON., OH 45177  
 Phone : 800-543-5589  
 Sch.Arrival : 02/06/2024 12:30 EST

Best Doors  
 Building PM 1: 1-40, 426-475

Shipper : R+L CARRIERS MONTGOMERY, NY  
 Address : 140 NEELYTOWN RD  
 MONTGOMERY, NY 12549  
 Phone : 800-464-1404  
 Sch.Departure : 02/06/2024 01:00 EST

3

Load Seg	Orig	Dest	Pro Svc Date	Pcs	Wt (Lbs.)	Shipper & Consignee	HM	Bulk	Pcs	Container Type	Wt (Lbs.)	Description
5	NBG	SWA	I245476332 02/14/24	9	361	(SHIPPER) GREENFIELD GLOBAL USA INC 58 VALE RD BROOKFIELD, CT 06804  (CONSIGNEE) AGC BIOLOGICS 16200 23RD DR W STE 101 EVERETT, WA 98203	X		9	PAIL	323 38	UN1170, ETHANOL, 3, PGII. HAZMAT EMERGENCY RESPONSE 800-424-9300 TARE WEIGHT P O # : 107871 UROUTE ID# : 2131268 1 SKD STC 9 PAILS OF HAZ
6	NBG	TTX	I245476341 02/09/24	29	890	(SHIPPER) GREENFIELD GLOBAL USA INC 58 VALE RD BROOKFIELD, CT 06804  (CONSIGNEE) ARTIVION 1300 E ANDERSON LN BL- DG A AUSTIN, TX 78752	X		29	CASE	852 38	UN1987, ALCOHOLS, N.O.S., 3, PGII. HAZMAT EMERGENCY RESPONSE 800-424-9300 CONTRACT# CCN17213 TARE WEIGHT P O # : 71789/1 REFERENCE# : 2131149 UROUTE ID# : 2131149 1PLT STC 29PC
7	NBG	SNA	I245476323 02/12/24	30	1040	(SHIPPER) GREENFIELD GLOBAL USA INC 58 VALE RD BROOKFIELD, CT 06804  (CONSIGNEE) THERMAL SCIENTIFIC INC 822 CANTWELL LN CORPUS CHRISTI, TX 78-408	X X X X X		10 8 2 8 2	CASE PAIL CASE CASE CASE	323 300 79 238 62	UN1294, TOLUENE, 3, PGII. UN1230, METHANOL, 3, PGII. UN1265, PENTANES, 3, PGII. UN1090, ACETONE, 3, PGII. UN1307, XYLENES, 3, PGII. HAZMAT EMERGENCY RESPONSE 800-424-9300 CONTRACT# 17213 OFFERER NAME CHEMTREC TARE WEIGHT P O # : CC8501 UROUTE ID# : 2128255 LIFT GATE REQUIRED ***

Seal# 24242362 Replaced By  
 Pco # 1903267 of Baytan #3211