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# Transportation/Hazardous Materials: U.S. Pipeline and Hazardous Materials Safety Administration Addresses Markings Applicable to Combustible Liquids

## Arkansas Environmental, Energy, and Water Law Blog

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The United States Pipeline and Hazardous Materials Safety Administration ("PHMSA") addressed in a September 15th letter the applicability of the Hazardous Materials Regulations ("HMR") applicable to the shipment of non-bulk combustible materials.

The question was posed by Tower Products, Inc. ("TPI") in a September 1st letter to the agency.

TPI provided PHMSA a product label showing that the United Nations number on a package and a shipping paper referenced the product as a combustible liquid. PHMSA noted that:

. . .you ask if the label and shipping paper presented in your letter are permissible while still taking the exception in § 173.150(f).

PHMSA answered in the affirmative.

The agency stated that:

. . .A person shipping a product excepted under the HMR's combustible liquid provisions may still mark the package so long as it is representative of the material or product being shipped. In your case, a material classified as a combustible liquid in a non-bulk packaging that is not a hazardous substance, hazardous waste, or a marine pollutant is excepted from the HMR (§ 173.150(f)(2)). Notwithstanding this exception, the shipper may still mark the package in accordance with Part 172, Subpart D and reference on the shipping paper that the material is a combustible liquid.

[A copy of the letter can be downloaded here.](#)