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## Transportation/Hazardous Materials: Pipeline and Hazardous Materials Safety Administration Interpretive Letter Addressing Ammonium Nitrate- Based Fertilizer

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The Pipeline and Hazardous Materials Safety Administration ("PHMSA") transmitted a July 17th letter clarifying the application of the Hazardous Materials Regulations ("HMR") applicable to the classification of ammonium nitrate-based fertilizer.

PHMSA's letter is a response to a March 1st letter from Uralkali Trading ("UT").

UT asks for the appropriate HMR classification of a material known by the tradename of "NS 30:7."

PHMSA initially notes that it is the shipper's responsibility to properly classify hazardous material in accordance with classification criteria provided in the HMR prior to offering it for transportation to or within the United States.

PHMSA's July 17th letter, however, does state that in accordance with Special Provision 150 of § 172.102, that ammonium nitrate-based fertilizer must be classified under the procedures of the UN Manual of Tests and Criteria, Part III, Section 39, "Classification Procedure and Criteria Relating to Solid Ammonium Nitrate Based Fertilizers."

A competent authority approval is not needed for transportation if the material meets the composition and testing requirements described in Section 39 for classification as UN 2067. In contrast, if the material does not fulfil the requirements for UN 2067, PHMSA states that there is therefore a need to obtain a competent authority approval prior to offering it for transportation, in accordance with § 107.709.

A copy of the July 17th letter can be downloaded [here](#).