Transportation/Hazardous Materials: Pipeline and Hazardous Materials Safety Administration Interpretive Letter Addressing Cargo Tank Markings



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The United States Pipeline and Hazardous Materials Safety Administration ("PHMSA") issued a December 20, 2024, Interpretive Letter addressing the application of the Hazardous Materials Regulations ("HMR") applicable to markings on cargo tanks. See Reference No. 24-0100.

PHMSA is responding to an October 19, 2024, request for clarification from Mann Energy Services ("MES").

MES asked whether:

…the "Emergency Shutoff" marking requirement provided in § 172.328(d) permits the use of a hyphen in the word shutoff as follows: "SHUT-OFF".

PHMSA responds in the affirmative, stating:

…Although the required text of "Emergency Shutoff" provided in § 172.328(d) does not include a hyphen in the word shutoff, it is the opinion of this Office that inserting a hyphen as described is not contrary to the intent of the requirement and does not cause confusion, alter, or diminish the meaning or effectiveness of the marking.

A copy of the Interpretive Letter can be downloaded here.