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Transportation/Hazardous Materials: Pipeline and Hazardous Materials Safety Administration Interpretive Letter Addressing Shipping Paper Preparation

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The United States Pipeline and Hazardous Materials Safety Administration ("PHMSA") transmitted a September 30th Interpretive Letter clarifying the Hazardous Materials Regulations ("HMR") applicable to the preparation of shipping papers. See Reference No. 25-0103.

PHMSA was responding to a July 23rd inquiry from Lennox Corporate ("Lennox").

Lennox provided a sample shipping paper for which it stated previously issued guidance that the sample provided met the requirements in § 172.201(a)(1)(i). Lennox also indicated that a carrier recently expressed concern with:

...use of the term "Dangerous Goods" as a header for each hazardous material description as shown in the sample shipping paper.

Lennox asked whether the sample provided complies with the shipping paper requirements in § 172.201(a).

PHMSA replies in the affirmative, stating:

...Display of the term "Dangerous Goods" in the manner shown does not conflict the requirements for the description of hazardous materials on a shipping paper.

The agency further states that when describing hazardous materials that are included on a shipping paper, a person is required to use one of the methods listed in § 172.201(a)(1)(i) through (a)(1)(iii), as the word "or" is used to indicate three separate options to identify hazardous materials on a shipping paper.

As a result, it is noted that listing the hazardous materials first as shown in the sample shipping paper provided in your incoming letter meets the requirements in § 172.201(a)(1)(i).

A copy of the Interpretive Letter and Lennox's sample can be found [here](#).