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



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The Pipeline and Hazardous Materials Safety Administration ("PHMSA") transmitted a January 27th Interpretive Letter addressing the application of the Hazardous Materials Regulations ("HMR") applicable to shipping papers. See Reference No. 25-0085.

PHMSA was responding to a June 24, 2025, letter from Oak Harbor Freight Lines ("OH").

OH asked whether:

… the emergency response phone number may be placed on a shipping paper—other than immediately following the description of a hazardous material— provided the emergency response number remains readily identifiable and in conformance with § 172.604.

OH provided a picture of a shipping paper with the emergency response phone number highlighted in yellow.

PHMSA responds that provided the emergency response phone number is readily identifiable and in conformance with the requirements specified in § 172.604(b), such a configuration would meet the requirements of § 172.604(a)(3)(ii). However, PHMSA notes that the provided picture also includes a separate, non-emergency phone number immediately following the description of the hazardous material. This is deemed a location usually associated with an emergency response telephone number.

PHMSA therefore states:

… While your emergency response phone number location in the above scenario is not in violation of the HMR, the non-emergency phone number immediately following the hazardous materials description on your shipping papers could lead to confusion and miscommunication in an emergency scenario.

PHMSA therefore recommends that OH either relocate the non-emergency phone number or place the emergency response number immediately following the hazardous materials description as outlined in § 172.604(a)(3)(i) to prevent frustration of your shipments.

A copy of the Interpretive Letter can be found here.