



U.S. Department of Transportation  
**Pipeline and Hazardous Materials  
Safety Administration**

1200 New Jersey Ave, S.E.  
Washington, D.C. 20590

JUN 06 2013

Ms. Sandra Richesin  
Safety Compliance Specialist  
Mr. Mike Brust  
Corporate Safety  
FedEx Freight Inc.  
2200 Forward Drive  
P.O. Box 840  
Harrison, AR 72602-0840

Reference No. 13-0046

Ms. Richesin and Mr. Brust:

This is in response to your e-mail requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR 171-180) applicable to shipping papers. Specifically, you ask about the proper placement of the type of packaging (i.e.; "BOX") on a shipping paper. The format of the shipping paper as shown in your e-mail is as follows:

PCS	HM	DESCRIPTION	WGT/lbs
1	X	BOX,UN2790,ACETIC ACID SOLUTION,8	26
		PGII	

You state that the word "BOX" is located in front (to the left) of the hazardous material basic description and ask whether this is in conformance with the requirements specified in § 172.202, "Description of hazardous material on shipping papers."

The number and type of packages must be indicated (for example, "1 box" or "8 fiberboard drums") on a shipping paper (see §§ 172.202(a)(7) and 172.202(c)) either before or after the required basic description. The number and type of packaging, total quantity shipped, and destination marks are the only entries permitted to precede the basic description, and may be repeated after the basic description.

As the shipping paper appears in your e-mail, we observe a few items that may be problematic. Although placed before the basic description, the word "BOX" appears to be under the column heading "Description," and is separated from the number of boxes, "1," which is placed under

the column heading "PCS." Additionally, the placement of "PGII" appears to be placed after the weight ("26"). The packing group should be directly following the hazard class.

We suggest either moving the word "BOX" to the first column (PCS) next to the "1" under a column heading such as "Number and Type of Packages," or moving column (PCS) so that it is above the word "BOX" and separated before or after the column heading "Description." Additionally, we suggest either moving "PGII" up to the line immediately following the hazard class ("8") or inserting vertical lines and horizontal lines where necessary; in effect creating columns and delineating more clearly the authorized split between the description requirements.

I hope this information is helpful. Please contact this office should you have additional questions.

Sincerely,

A handwritten signature in black ink, appearing to read "T. Glenn Foster", with a long horizontal flourish extending to the right.

T. Glenn Foster  
Chief, Regulatory Review and Reinvention Branch  
Standards and Rulemaking Division

McIntyre  
§172.202  
Shipping Papers  
13-0046

**Drakeford, Carolyn (PHMSA)**

**From:** INFOCNTR (PHMSA)  
**Sent:** Tuesday, February 19, 2013 2:20 PM  
**To:** Drakeford, Carolyn (PHMSA)  
**Subject:** FW: Request for Interpretation - Description of Hazardous Material on Shipping Papers 172.202

Hi Carolyn,

We received the following request for a formal letter of interpretation.

Thanks,  
Victoria

**From:** Richesin, Sandra --- Safety Compliance Specialist --- GO [<mailto:sandra.richesin@fedex.com>]  
**Sent:** Thursday, February 14, 2013 7:04 PM  
**To:** INFOCNTR (PHMSA)  
**Subject:** Request for Interpretation - Description of Hazardous Material on Shipping Papers 172.202

February 14, 2013

**Pipeline and Hazardous Materials Safety Administration (PHMSA)**

U.S. Department of Transportation  
Pipeline and Hazardous Materials Safety Administration  
East Building, 2nd Floor  
1200 New Jersey Ave., SE  
Washington, DC 20590

We are requesting an interpretation concerning the placement of the type of package on the hazardous material shipping paper.

Below is the format of the shipping paper:

PCS	HM	DESCRIPTION	WGT/lbs
1	X	BOX,UN2790,ACETIC ACID SOLUTION,8	26
		PGII	

With the word "BOX" located in front of the hazardous material basic description which is the type of package required by 49 CFR 172.202(7), is this compliant with the requirements contained in 49 CFR 172.202 – Description of hazardous material on shipping papers?

We appreciate your time in reviewing this request and look forward to receiving a response.

Respectfully,

Sandra Richesin

Mike Brust

Safety Compliance Specialist

Manager – Corporate Safety

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870-704-5339

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**Reference No. 13-0046**

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We are requesting an interpretation concerning the placement of the type of package on the hazardous material shipping paper.

Below is the format of the shipping paper:

<b>PCS</b>	<b>HM</b>	<b>DESCRIPTION</b>	<b>WGT/lbs</b>
1	X	BOX,UN2790,ACETIC ACID SOLUTION,8	26
		PGII	

With the word "BOX" located in front of the hazardous material basic description which is the type of package required by 49 CFR 172.202(7), is this compliant with the requirements contained in 49 CFR 172.202 – Description of hazardous material on shipping papers?

We appreciate your time in reviewing this request and look forward to receiving a response.

Respectfully,

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