



U.S. Department
of Transportation

Pipeline and Hazardous
Materials Safety
Administration

1200 New Jersey Avenue, SE
Washington, D.C. 20590

FEB 11 2014

Mr. Jason M. Stevens
Warehouse Manager
Strem Chemicals, Inc.
7 Mulliken Way
Newburyport, MA 01950

Ref. No.: 13-0234

Dear Mr. Stevens:

This is in response to your letter dated December 2, 2013, requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) relating to the description of hazardous substances on shipping papers, and the placement of the letters "RQ". You provide an example shipping paper which shows the "RQ" notation after the basic description, but not in a location immediately before or after the basic description. You note that it is your understanding that the "RQ" must be immediately before or after the basic description. You ask for confirmation that the "RQ" notation as shown in your example shipping paper would not be in compliance with § 172.203(c)(2).

Section 172.203(c)(2) requires the letters "RQ" to be entered on the shipping paper either before or after the basic description required by § 172.702 for each hazardous substance, and provides examples of acceptable methods of noting the letters "RQ" on shipping papers. The two examples given are not the only acceptable places to note the letters "RQ". The "RQ" component may follow the basic description of the hazardous material in any reasonable format, provided it is clearly part of the entry. It is the opinion of this office that the indication "RQ (Benzene)" as illustrated in the example provided appears after the basic description as required by the HMR. The example shipping paper provided only shows one entry for a hazardous material. If there are multiple consecutive entries, care should be taken to ensure it is clear which entry the "RQ" notation is associated with.

I trust this information is helpful. If you have further questions, please do not hesitate to contact this office.

Sincerely,

Duane A. Pfund
International Standards Coordinator
Standards and Rulemaking Division

Webb
§ 172.203 (c)(2)
Shipping Papers
13-0234

December 2, 2013

U.S. DOT
PHMSA Office of Hazardous Materials Standards
Attn: PHH-10
East Building
1200 New Jersey Avenue, SE.
Washington, DC 20590-0001

Dear Sirs,

I am writing to you for clarification regarding additional description requirements for shipping papers as specified in 49 CFR 172.203(c)(2). When applicable, the letters "RQ" must be entered on the shipping paper either before or after the required basic description. It is my understanding that the basic description of a hazardous material includes the Identification Number, the Proper Shipping Name, Hazard Class/Division followed by subsidiary Hazard Class(es)/Division(s) as appropriate, and Packing Group when applicable.

Consistent with your examples provided in the HMR, this requirement appears to leave the shipper with only two clear options when entering the letters "RQ", before or after the basic description.

Despite this, I have encountered an influential training agency teaching its members and participants something quite different. Namely, it is being taught that the "RQ" can be inserted following other information required on shipping papers, despite the fact that the information that it follows is not part of the basic description. Below, I have created an example of a shipping paper prepared for air transportation which illustrates acceptable information being conveyed to trainees:

NATURE AND QUANTITY OF DANGEROUS GOODS						
Dangerous Goods Identification						
UN or ID No.	Proper Shipping Name	Class or Division (Subsidiary Risk)	Packing Group	Quantity and type of packing	Packing Inst.	Authorization
UN 1993	Flammable liquid, n.o.s. (Ethanol, Benzene)	3	III	1 Steel Drum X 150L RQ (Benzene)	366	

It is my opinion that this example does not meet the requirements as set forth by 49 CFR 172.203(c)(2) therefore it could not possibly be compliant. It is my hope that you will confirm that my understanding is correct. If confirmed, I will forward your interpretation along to the training agency in hopes that they will adjust their teachings and avoid misleading their students. I appreciate your clarification in the matter.

Sincerely,

A handwritten signature in black ink that reads "Jason M. Stevens". The signature is written in a cursive style with a large, looping initial "J" and "S".

Jason M. Stevens
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Strem Chemicals, Inc.
7 Mulliken Way
Newburyport, MA 01950
jason@strem.com