



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

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

DEC 20 2012

Ms. Susan Numbers  
North America Regional Trainer  
Expeditors-Cleveland  
6950 Engle Road  
Suite XX  
Middleburg Heights, OH 44130

Ref. No. 12-0255

Dear Ms. Number:

This responds to your November 5, 2012 request for clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the basic shipping description of a hazardous material on a shipping paper. Specifically, in your incoming letter you provide examples of shipping papers and request clarification if these are acceptable formats. Your questions are paraphrased and answered below.

Q1. If a shipping paper uses column headings to describe the format and order of the required basic shipping description as specified in §§ 172.202(a)(1)-(4) and the heading for the first column is titled "UN No", do the letters "UN" still need to be included in the line item entry in front of the 4 digits?

A1. Yes, in accordance with § 172.202(a)(1) the identification number prescribed for the material as shown in column (4) if the §172.101 table must be displayed. This would include the letters "UN" as part of the UN Identification Number assigned to that hazardous material.

Q2. You provide an example of a shipping paper and ask if the horizontal row format and row headings used in the example would be acceptable under §§ 172.202(a)(1)-(4)?

A2. No, in accordance with § 172.202(b) the basic shipping description specified in §§ 172.202(a)(1)-(4) must be shown in sequence with no additional information interspersed. While a horizontal format is not prohibited, the inclusion of row headings intersperses additional information in the basic shipping sequence and therefore is prohibited.

Q3. Would the addition of a colon “:” or “#” between the letters “UN” and the 4 digits of the UN number be considered interspersed information (i.e. UN:1564 or UN#1564) and therefore prohibited.

A3. Yes, the addition of a colon “:” or “#” between the letters “UN” and the 4 digits of the UN number is prohibited. In accordance with § 172.202(b) the basic shipping description specified in §§ 172.202(a)(1)-(4) must be shown in sequence with no additional information (i.e. “:” or “#”) interspersed.

Q4. When using a shipping paper with a horizontal row format, is the shipping paper required to include “UN” in conjunction with the four digit number (i.e. “3077”) in the basic shipping description if the row header makes a reference to the “UN” (i.e. UN #, UN No., or UN)?

A4: See A2. Furthermore, the shipping paper is required to include “UN” in conjunction with the four digit number (i.e. “3077”).

I hope this answers your inquiry. If you need further assistance, please contact this office at (202) 366-8553.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Benedict". The signature is written in a cursive style with a large initial "R".

Robert Benedict  
Chief, Standards Development Branch  
Standards and Rulemaking Division

Boothe  
§172.201  
§172.202(b)

**Drakeford, Carolyn (PHMSA)**

**From:** Edmonson, Eileen (PHMSA)  
**Sent:** Tuesday, November 13, 2012 11:57 AM  
**To:** Drakeford, Carolyn (PHMSA)  
**Cc:** Betts, Charles (PHMSA)  
**Subject:** FW: PHMSA Letters of Clarification Concerning the Basic Description Sequence on Shipping Papers

Shipping Papers  
12-0255

Hi Carolyn,

Please process this e-mail letter for response. The section numbers are: §§ 172.201 & 172.202(b).

I don't care who you assign it to.

Thanks,

Eileen Edmonson  
USDOT/PHMSA  
(202) 366-4481 (w)  
(202) 366-7041 (f)  
[eileen.edmonson@dot.gov](mailto:eileen.edmonson@dot.gov) (e-mail)  
<http://www.phmsa.dot.gov/hazmat> (website)  
[infocntr@dot.gov](mailto:infocntr@dot.gov) (Hazmat Info Center E-mail)

**From:** Susan Numbers [<mailto:Susan.Numbers@expeditors.com>]  
**Sent:** Monday, November 05, 2012 9:24 AM  
**To:** Edmonson, Eileen (PHMSA)  
**Cc:** Betts, Charles (PHMSA)  
**Subject:** RE: PHMSA Letters of Clarification Concerning the Basic Description Sequence on Shipping Papers

Hello Ms. Edmonson,

Thank you for the below letters of clarification. They were very helpful, but I would like some further clarification on the basic description with regards to some further format issues that were not specifically addressed in the letters below. I would like to request PHMSA's interpretation of the below scenarios.

**Scenario #1:** When the column heading is titled "UN or ID No", the letters UN must be used for the UN Number (letters UN then 4 digits). What if the column heading is just titled "UN No"....do the letters "UN" still need to be in front of the 4 digits?

My understanding of the regulations has always been...no matter what the title of the column heading on the form (either "UN or ID No" or "UN No", the letters "UN" must always be used as part of the UN number. Please clarify.

UN or ID No	Proper Shipping Name	Class of Division (Subsidiary Risk)	Pack- ing Group
UN1203	MOTOR SPIRIT	3	II

**Scenario #2:** Is the below format for the basic description considered acceptable?

My understanding has been that the below row heading titles should be treated the same as column heading titles and this would not be considered interspersed information. Please clarify.

UN NUMBER (国連番号)	UN 1263
PROPER SHIPPING NAME (品名)	PAINT
CLASS (クラス)	CLASS 3
SUBSIDIARY HAZARD CLASS (副次危険性等級)	
PACKING GROUP (包装等級)	PG II

**Scenario #3:** Would the addition of a colon ":" between the letters "UN" and the 4 digits of the UN number be considered interspersed information? Would the same also apply to the number sign"#" between the letters UN and the 4 digits? (i.e. UN#1564)

My understanding has been, yes... the ":" or "#" would not be acceptable. Please clarify.

**UN : 1564**  
**PSN: BARIUM COMPOUND,N.O.S**  
**Technical Name : NA**  
**Class: 6.1**  
**Sub Risk (if any) - NA**  
**PG : III**  
**Marine Pollutant - N**

**Scenario #4:** Further to two of my scenarios above, on this format , (using the row heading of just "UN" NO...excluding the choice of "UN or ID" number).... The shipper has not indicated a "UN" in conjunction with "3077".

My understanding is this would not be acceptable. Please clarify.

**15.UN NO:** 3077  
**16.Proper Shipping Name:** Environmentally hazardous substance,solid,n.o.s.  
**17.Technical Name:** N-CYCLOHEXYLTHIOPHTHALIMIDE  
**18.IMO Harzad Class:** 9  
**19.Packing Group:** III

Please contact me should you need any clarification on the above.

Thank You  
Susan

Susan Numbers  
North America Regional Trainer

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