

Hazardous Materials/Transportation: U.S. Pipeline and Hazardous Materials Safety Administration Addresses Overpacking Question



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04/30/2019

The United States Pipeline and Hazardous Materials Safety Administration (“PHMSA”) in a February 25th letter provided clarification of the Hazardous Materials Regulations (“HMR”) applicable to the shipment of hazardous materials in the same overpack together with materials not meeting the definition of hazardous material.

PHMSA was responding to a June 20th letter submitted by DG Advisor, LLC (“DG”).

DG asked two questions.

First, the organization asked if a non-hazardous material can be placed in an overpack that contains a hazardous material package. PHMSA answered in the affirmative, stating:

... The HMR do not prescribe requirements or limitations for non-hazardous material packed in overpack; therefore, there is no prohibition from including hazardous and non-hazardous material in an overpack together.

Second, the organization ask if the non-hazardous material must be considered when determining the applicability of the placarding exemption in § 172.504(c). PHMSA answered in the negative, stating:

... The weight of the non-hazardous material is not included in the determination of aggregate gross weight of the hazardous material for the purposes of the placarding exemption for non-bulk packages found in § 172.504(c).

A copy of the February 25th PHMSA letter can be found [here](#).