

Transportation/Hazardous Materials: U.S. Pipeline and Hazardous Materials Safety Administration Interpretive Letter Addressing Diesel Fuel



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The United States Pipeline and Hazardous Materials Safety Administration ("PHMSA") addressed in a January 17th letter a question regarding the applicability of the Hazardous Materials Regulations ("HMR") applicable to the domestic transportation of diesel fuel. See Reference No. 19-0111.

PHMSA was responding to an August 30th email from Fuelie Systems, Inc. ("Fuelie").

Fuelie references a Letter of Interpretation that states in part:

[i]n accordance with § 172.101(b)(3) and (b)(5), you may use either the international or domestic entry in the [Hazardous Material Table (HMT)] for domestic transportation of methanol.

PHMSA notes that the Letter of Interpretation clarifies that it is permissible to use either international or domestic Hazardous Materials Table for domestic transportation of methanol. The company in its email asks whether it is similarly permissible to use either the international or domestic entry for the domestic transportation of diesel fuel.

PHMSA answers in the affirmative, noting:

The HMT includes two entries for diesel fuel, "NA1993" and "UN1202." The "UN1202" entry has an "I" in Column (1) indicating its use for international and domestic transportation (emphasis added). The "NA1993" entry has a "D" in Column (1) indicating its use for domestic transportation only (emphasis added). A person may select either entry for the purposes of domestic transportation.

PHMSA does note that the combined or partial use of the domestic and international entry is not permissible. It cites as an example that diesel fuel may be described as either "UN1202" or "NA1993" for the purposes of domestic transportation. However, it qualifies that a package containing diesel cannot be marked with "UN1202" while describing it on a shipping paper as "NA1993" or vice versa.

A copy of the January 17th letter can be downloaded [here](#).