

Transportation/Hazardous Materials: U.S. Pipeline and Hazardous Materials Safety Administration Interpretive Letter Addressing Lading Density



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The United States Pipeline and Hazardous Materials Safety Administration (“PHMSA”) addressing in an October 15th letter the application of the Hazardous Materials Regulations (“HMR”) to lading density.

PHMSA was responding to a May 26th letter from ICL Americas (“ICL”).

ICL asked for a clarification of the HMR applicable to lading density and the maximum weight of lading when loading cargo tanks. The company referenced a previous PHMSA Letter of Interpretation that was dated September 25, 1996. See Reference No. 96-0182. ICL asked whether the Letter of Interpretation remained valid.

PHMSA answers in the affirmative.

The prior Letter of Interpretation stated that a:

. . . hazardous material with a density which exceeds the maximum lading density for the cargo tank indicated on the name plate may be loaded into a cargo tank as long as the maximum weight of the lading marked on the specification plate is not exceeded. 49 C.F.R. § 173.24b(d)(2) is cited.

A copy of the PHMSA letter can be downloaded [here](#).