



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

May 1, 2024

Mr. Tom Bartfai
Hazardous Materials Specialist, Motor Carrier & Rail Enforcement
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, OH 43215

Reference No. 24-0020

Dear Mr. Bartfai:

This letter is in response to your March 20, 2024, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to shipping papers. In your email, you note that when a shipping paper contains both hazardous and non-hazardous materials, shippers must differentiate between the two using at least one of the methods indicated in § 172.201(a)(1).

We have paraphrased and answered your questions as follows:

- Q1. Your incoming email and photo present a shipping paper which utilizes all three of the options listed in § 172.201(a)(1) simultaneously—i.e., the hazardous materials entries are entered first, the hazardous materials entries are identified by the entry of an “X” placed before the basic shipping description in a column captioned “HM”, and the hazardous materials basic shipping descriptions are highlighted. You ask whether—as shown in the photo—it is permissible to highlight more than just the basic shipping description.
- A1. The answer is yes, provided the additional highlighted information on the shipping paper is associated with—and is consistent with—the hazardous materials being shipped.
- Q2. If the highlight option in § 172.201(a)(1)(ii) is the only method used to differentiate between hazardous materials and non-hazardous materials on a shipping paper, you ask whether it is acceptable to highlight more than the basic description as seen in the photo you provided.

A2. Please see answer A1.

I hope this information helpful. Please contact us if we can be of further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Andrews". The signature is written in a cursive, slightly stylized font.

Steven Andrews
Acting Chief, Regulatory Review and Reinvention Branch
Standards and Rulemaking Division