



U.S. Department
of Transportation
**Research and
Special Programs
Administration**

400 Seventh St., S.W.
Washington, D.C. 20590

MAR 12 2004

Mr. Wes Pace
Hazmat Compliance Manager
Landstar Carrier Services
13410 Sutton Park Dr. S.
Jacksonville, FL 32224

Ref. No. 03-0324

Dear Mr. Pace:

This is in response to your letter dated December 19, 2003, regarding the proper description of hazardous materials on a shipping paper required under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask whether an "X" in the HM column where there is no "basic description" listed or where additional information begins prior to the basic description would be permissible under § 172.201 of the HMR.

The answer is no. The hazardous material entries must be clearly and readily identifiable when described on the same shipping paper with materials not subject to the HMR. The basic description consisting of the proper shipping name, hazard class, identification number, and packing group, must be shown in proper sequence, as required in § 172.202 (a) and (b). As stated in § 172.201(a)(1)(iii), the "X" must be placed in the HM column before the proper shipping name. Any additional information required by § 172.203 must be placed after the basic description, unless otherwise permitted. The number and type of packaging, total quantity shipped, and destination marks are the only entries permitted to precede the basic description and may be repeated after the basic description. The required shipping description may not contain any code or abbreviation, unless specifically authorized. A shipper's certification statement must appear on the shipping paper as required by § 172.204.

We trust this satisfies your request. Please contact us if we can be of more assistance.

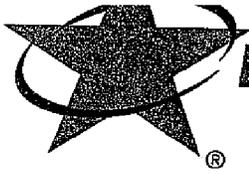
Sincerely,

Hattie L. Mitchell, Chief
Regulatory Review and Reinvention
Office of Hazardous Materials Standards



030324

172.201



LANDSTAR®
Compliance

0210
§172.201(a)(iii)
Shipping Papers
03-0324

12/19/03

Edward Mazzula
Office of Hazardous Materials Standards
Room 8422
Washington, D.C. 20590

Mr. Mazzula,

I'm seeking a clarification on 172.201 (a)(iii) and specifically, if it's permissible to have an "X" in the HM column where there is no "basic description" listed and secondly if it's permissible to have an X in the HM column where additional info begins vs. the actual basic description.

An example would be government bill of lading (CBL)(enclosed) that uses multiple pages and typically has all commodities listed on pages other than the cover page. On their cover page, they will have a notation in the description column that states this bill consist explosives or ammunition etc. (no basic description) and the number of pages the bill consist of. They have an "X" in the HM column (on the cover page) where there is no basic description listed.

Please clarify that by placing an "X" in the HM column where there is no "basic description" listed, would not be permissible per the regulations as well as having an "X" in the HM column where additional info begins prior to the basic description.

Your written opinion and comments are appreciated

Sincerely,

Wes Pace
Hazmat Compliance Manager
Landstar Carrier Services
13410 Sutton Park Dr. S.
Jacksonville, Fl. 32224

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