



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

DEC 9 1999

Mr. John D. Steinhoff
U.S. Department of Transportation
Office of Motor Carrier Safety
City Crescent Building, Suite 4000
10 S. Howard Street
Baltimore, MD 21201

Ref. No. 99-0305

Dear Mr. Steinhoff:

This is in response to your letter dated November 2, 1999, regarding the proper shipping description for gas oil under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you asked which of the following are proper shipping descriptions for gas oil:

- (1) Gas oil, 3, UN1202, III
- (2) Gas oil, Combustible liquid, UN1202, III
- (3) Gas oil, 3, Combustible liquid, UN1202, III
- (4) Combustible liquid, n.o.s., (Gas oil), UN1202, III

Description (1) is correct. The proper shipping description for gas oil specified in the Hazardous Materials Table (HMT; § 172.101) is "Gas oil, 3, UN1202, PG III." Description (2) is appropriate if the gas oil is reclassified as a combustible liquid in accordance with § 173.150(f). When a material is reclassified in accordance with § 173.150(f), each reference to Class 3 is modified to read "Combustible liquid" (§ 172.101(d)(4)).

Description (3) is incorrect. Two hazard classes have been identified; Hazard class 3 (Flammable liquid) and Combustible liquid. While § 172.202(a)(2) allows shippers to enter a subsidiary class name, subsidiary class or division number following the numerical hazard class, combustible liquid can not be a subsidiary of a flammable liquid. Description (4) is also



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172.101 (6)

incorrect. Section 172.101(d)(4) allows the hazard class to be modified from "3" to "Combustible liquid," but does not authorize modification of the proper shipping name. In addition, UN1202 is not the correct identification number for the proper shipping name "Combustible liquid, n.o.s."

I hope this satisfies your request.

Sincerely,



John A. Gale
Transportation Regulations Specialist
Office of Hazardous Materials Standards



U.S. DEPARTMENT OF TRANSPORTATION
Office of Motor Carrier Safety
City Crescent Building, Suite 4000
10 S. Howard Street
Baltimore, MD 21201
November 2, 1999

BAA
§172.101 (G)
Gas Oil
99-0305

IN REPLY REFER TO

OMCS-EA

Mr. Edward T. Mazzullo, Director
Office of Hazardous Materials Standards
Research & Special Programs Administration
400 7th Street, S. W., Room 8102
Washington, DC 20590

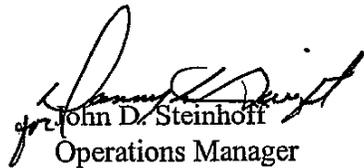
Dear Mr. Mazzullo:

Attached, is a request for interpretation of the Hazardous Materials Regulations, which was sent to me by Senior Trooper Tod Williams, from the Texas Department of Public Safety. Specifically, Trooper Williams is seeking guidance on what would be the proper basic description of Gas Oil? The following are examples of what the folks in the field have been seeing on shipping papers for this product:

1. Gas oil, 3, UN1202, II (As shown in the HM table)
2. Gas oil, combustible liquid, UN1202, III (Per 173.150(b) & 172.101(d)(4))
3. Gas oil, 3, combustible liquid, UN1202, III (Per 172.202(a)(2))
4. Combustible liquid n.o.s.(Gas oil), UN1202, III

Please review Trooper Williams' request for interpretation and, the 4 examples above, and provide us with a written response as to what would be a proper or acceptable basic description for this product.

Sincerely,


John D. Steinhoff
Operations Manager
Office of Motor Carrier Safety

cc: Senior Trooper Tod Williams