



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, D.C. 20590

NOV 19 2007

Mr. Bayard Pelsor
EHS Manager
The Shepherd Chemical Company
4900 Beech Street
Norwood, Ohio 45212

Ref. No. 07-0196

Dear Mr. Pelsor:

This is in response to your e-mail asking whether the abbreviation "TT" is acceptable under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) for representing a cargo tank when indicating the packaging type on shipping papers. You point out that the U.S. Environmental Protection Agency (EPA) authorizes the abbreviation for hazardous waste manifests. In a follow-up telephone conversation with a member of my staff you asked whether "TT" would be an acceptable abbreviation on shipping papers for hazardous materials that do not require a hazardous waste manifest.

The answer is yes. The abbreviation "TT" is a commonly accepted and recognizable abbreviation for cargo tanks (tank trucks) and, thus, may be used to indicate a shipment's packaging type on shipping papers in accordance with § 172.202(a)(6) of the HMR.

I hope this information is helpful. Please contact this office should you have additional questions.

Sincerely,

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

From: INFOCNTR <PHMSA>
Sent: Friday, October 05, 2007 3:58 PM
To: Drakeford, Carolyn <PHMSA>
Subject: FW: Request for interpretation

Wants a written interp.
Thanks,
Rob

From: Bayard Pelsor [mailto:bpelsor@shepchem.com]
Sent: Friday, October 05, 2007 11:58 AM
To: INFOCNTR <PHMSA>
Cc: Jennifer Brown
Subject: Request for interpretation

U.S. Dept of Transportation – Information Center

This is a request for interpretation.

49 CFR 172.202(a)(7) states that abbreviations may be used on shipping papers for indicating packaging types provided the abbreviations are commonly accepted and recognizable.

Is ""TT" an acceptable abbreviation for "Cargo Tank"? It is listed on the back of U.S. EPA's Form 8700-22 Uniform Hazardous Waste Manifest as an acceptable abbreviation.

Thank you.

Bayard Pelsor
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