



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

October 21, 2024

Norm Stollberg
Global Dangerous Goods Expert
Master Builders Solutions
7778 Four Seasons Blvd
Kissimmee, FL 34747

Reference No. 24-0099

Dear Mr. Stollberg:

This letter is in response to your September 11, 2024, letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the description of hazardous materials on shipping papers. Specifically, you state that a freight forwarder refused to process your shipment because the words “US DOT” were on the shipping paper in association with the hazardous materials description. You state that the description on the shipping paper appeared as “US DOT: UN1760, Corrosive Liquid, N.O.S. (Nitrilotrimethylenetris (Phosphoric Acid)), 8, III, ERG 154, Danger Label: 8.” Lastly, you seek confirmation that your understanding is correct that the basic description is in the correct sequence and is not interspersed with additional information.

Based on the information you have provided, it appears that your understanding is correct. As specified in § 172.202(b), the basic description specified in § 172.202(a)(1) through (4) must be shown in sequence with no additional information interspersed. It appears that the basic description you have provided is in the correct sequence and the additional information is outside of that description.

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

Sincerely,

Shane C. Kelley
Director
Standards and Rulemaking Division
Office of Hazardous Materials Safety



Master Builders Solutions Admixtures US, LLC
23700 Chagrin Blvd, Beechwood, OH 44122

Mr. Shane Kelley
Director, Standards Rule Making Division
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09.11.2024
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Dear Mr. Kelley or Designated Representative

Reference for Intepretation: 49 CFR 172.202(a), (1),(2),(3),(4) and 172.202(b)

I had a freight forwarder who refused to process a shipment because US DOT: was shown in the Basic Shipping Description. The following is the completed description on the BOL

US DOT: UN1760 CORROSIVE LIQUID,
N.O.S.(NITRILOTRIMETHYLENETRIS(PHOSPHORIC ACID), 8, III, ERG 154,
Danger Label: 8

49 CFR 172.202 states that the basic shipping descriptions contains the:

(a) The shipping description of a hazardous material on the shipping paper must include:

(1) The identification number prescribed for the material as shown in Column (4) of the § 172.101 table;

(2) The proper shipping name prescribed for the material in Column (2) of the § 172.101 table;

(3) The hazard class or division number prescribed for the material, as shown in Column (3) of the § 172.101 table and the subsidiary hazard class when applicable; and

(4) The packing group in Roman numerals, as designated for the hazardous material in Column (5) of the § 172.101 table.

Futhermore 49 CFR 172.202(b) states:

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Except as provided in this subpart, the basic description specified in paragraphs (a)(1), (2), (3), and (4) of this section must be shown in sequence with no additional information interspersed. For example, "UN2744, Cyclobutyl chloroformate, 6.1, (8, 3), PG II." Shipping descriptions for hazardous materials offered or intended for transportation by rail that contain all the information required in this subpart and that are formatted and ordered in accordance with recognized electronic data interchange standards and, to the extent possible, in the order and manner required by this subpart are deemed to comply with this paragraph.

In my opinion on this occasion the freight forwarder is incorrect in their determination because the basic description that is included above is in the correct sequence and it is not interrupted or interspersed. Am I correct in my determination?



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