

**From:** [INFOCNTR \(PHMSA\)](#)  
**To:** [Baker, Yul \(PHMSA\)](#)  
**Cc:** [Hazmat Interps](#)  
**Subject:** FW: Letter of Interpretation  
**Date:** Thursday, May 29, 2025 14:39:53  
**Attachments:** [Sample Hazmat BOL.pdf](#)

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Hi Yul,

Please see the below interpretation request and attachment. Let us know if you need anything.

Sincerely,  
Janaye

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**From:** Sam Klein <[sklein@campbellsexpress.com](mailto:sklein@campbellsexpress.com)>  
**Sent:** Wednesday, May 28, 2025 4:43 PM  
**To:** INFOCNTR (PHMSA) <[INFOCNTR.INFOCNTR@dot.gov](mailto:INFOCNTR.INFOCNTR@dot.gov)>  
**Subject:** Letter of Interpretation

You don't often get email from [sklein@campbellsexpress.com](mailto:sklein@campbellsexpress.com). [Learn why this is important](#)

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Good Afternoon,

I am requesting a letter of interpretation regarding the attached bill of lading documentation.

1. We have a customer who is packing UN3481 Lithion Ion Batteries and UN3091 Lithium Metal Batteries together. They are representing both Hazard ID's on the same line. However, based upon my research and training, I believe each Hazard ID has to be on a separate line. Can you confirm whether they should be listed separately?
2. On the BOL, the total weight is listed for the single, combined line of hazmat, as opposed to individual weights for each of the appropriate Hazard ID's. Can you confirm if the weight should be separated for each Hazard ID?
3. The BOL has a Hazardous Materials column, but there is no checkmark or "x" alongside the Hazardous line item. Shouldn't there be?
4. Lastly, the packaging type for this Hazardous line item isn't listed before or after the Hazardous line item. What is represented is pre-printed on the BOL as "CartonCnt" above the column in which a quantity is input. Does this suffice for the packaging type or should it be listed in closer proximity to the Hazardous description?

Thank you for your assistance. Please feel free to contact me with any questions.

Sincerely,  
Sam Klein  
CIO  
Campbell's Express  
856-589-8300 x210  
[sklein@campbellsexpress.com](mailto:sklein@campbellsexpress.com)