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To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>

Subject: Subject: Request for Letter of Interpretation – Applicability of HMR Training Requirements for UN3082, Environmentally Hazardous Substance, Liquid, n.o.s., Marine Pollutant in Non-Bulk Packaging

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Subject: Request for Letter of Interpretation – Applicability of HMR Training Requirements for UN3082, Environmentally Hazardous Substance, Liquid, n.o.s., Marine Pollutant in Non-Bulk Packaging

Dear Sir or Madam,

I am writing to formally request a letter of interpretation regarding the applicability of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171–180) to shipments

of **UN3082, Environmentally hazardous substance, liquid, n.o.s., Class 9, Packing Group III, Marine Pollutant**, when transported in **non-bulk packaging** via **highway, rail, or aircraft** within the United States.

According to 49 CFR § 171.4(c)(1)(iii), the HMR does not apply to marine pollutants transported **in non-bulk packaging by motor vehicle, rail car, or aircraft**. Based on this provision, we interpret that such shipments would not be subject to any of the HMR requirements, including **subpart H – training requirements** in 49 CFR Part 172.

I am seeking confirmation of the following:

1. That **UN3082**, when transported **in non-bulk packaging by highway, rail, or aircraft**, is **not subject to the HMR** per § 171.4(c)(1)(iii); and
2. That, based on this exemption, **no training is required** under Subpart H of 49 CFR Part 172 for employees solely involved in handling or preparing such shipments. I would greatly appreciate your written confirmation or clarification on this matter.

Thank you for your time and attention to this request.