From:	INFOCNTR (PHMSA)
То:	Baker, Yul (PHMSA)
Cc:	Hazmat Interps
Subject:	FW: Written Interpretation Request
Date:	Wednesday, July 2, 2025 13:36:25
Attachments:	imaqe001.pnq imaqe002.pnq

Good afternoon,

Please see the following request for a letter of interpretation. Please let us know if you need anything else.

Best,

Aminah

From: tad.rumas@puco.ohio.gov <tad.rumas@puco.ohio.gov>
Sent: Wednesday, July 2, 2025 9:24 AM
To: PHMSA HM InfoCenter <PHMSAHMInfoCenter@dot.gov>
Subject: Written Interpretation Request

You don't often get email from <u>tad.rumas@puco.ohio.gov</u>. <u>Learn why this is important</u>

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To whom it may concern,

I am seeking clarification on the proper and/or specific location for the additional description entries as required by 49CFR Part 172.203(d)(1) - (d)(10).

Specifically, 172.203(d) Radioactive material, provides the following: "the description for a shipment of a Class 7 (radioactive) material <u>must include</u> the following additional entries as appropriate" which appears to indicate that <u>all</u> additional entries must immediately follow the basic description required by Part 172.202. However, 172.203(d)(9)(ii) provides "the statement 'Exclusive Use Shipment' may be entered only once on the shipping paper in a clearly visible location" and 172.203(d)(10) provides "the words 'Highway route-controlled quantity' or 'HRCQ' must be entered in association with the basic description", while 172.203(d)(1) – (d)(8) provides no such specificity.

My questions are as follows:

Q1 - Does the term "the description for a shipment of a Class 7 (radioactive) material must

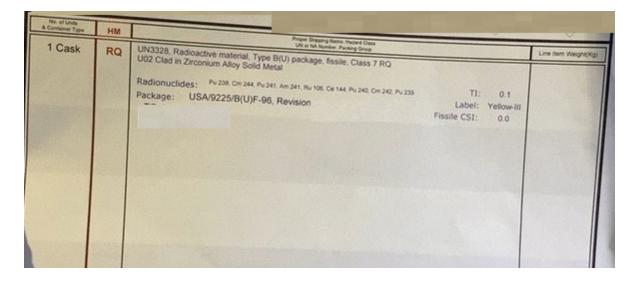
<u>include</u>" indicate that the additional information must <u>immediately</u> follow the basic description (to include horizontal or vertical format) only?

Q2 – Does the term "in association with" also indicate that the additional information must <u>immediately</u> follow the basic description (to include horizontal or vertical format) only? Q3 – Based on the answer to Q1 & Q2, would it be permissible for information required by 172.203(d)(1) – (d)(8) to be in another location on the shipping paper?

Q4 – Based on the answer to Q1 & Q2, when are entries no longer considered "in association" with the basic description?

Q5 – Based on the answer to Q1 & Q2, when are entries no longer considered as "not included" with the basic description?

For reference, please see the example below.



Thank you in advance,



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