

**From:** [INFOCNTR \(PHMSA\)](#)  
**To:** [Baker, Yul \(PHMSA\)](#)  
**Cc:** [Hazmat Interps](#)  
**Subject:** FW: Interpretation Request Related to 49 CFR 172.201(a)(1)  
**Date:** Wednesday, July 23, 2025 16:36:06  
**Attachments:** [image003.png](#)

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Hi Yul,

Please see the below interpretation request.

Let us know if you need anything,

-Breanna

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**From:** Johnson, Robert <Robert.Johnson@Lennox.com>  
**Sent:** Wednesday, July 23, 2025 7:08 AM  
**To:** INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>  
**Subject:** Interpretation Request Related to 49 CFR 172.201(a)(1)

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To whom it may concern,

I would like to request a formal interpretation regarding whether the following format for listing HAZMAT on a shipping paper satisfies the requirements of 172.201(a)(1)(i) & (ii):

| Shipper:         |              |            | Consignee:                                                                                                                                                               |                       |                  |
|------------------|--------------|------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|------------------|
| No. Shp<br>Units | Pkg.<br>Type | SKU<br>Qty | Descriptions of articles<br>special marks and Exceptions                                                                                                                 | Weight<br>(in lbs)    | Class<br>or rate |
| 1                |              | 1          | ***** DANGEROUS GOODS *****<br>UN2857, Refrigerating machines<br>(containing non-flammable, non-toxic<br>gases), 2.2                                                     | (1,077.3 kg)<br>2,375 | PAK 77.5         |
| 1                |              | 1          | ***** DANGEROUS GOODS *****<br>UN2857, Refrigerating machines<br>(containing non-flammable, non-toxic<br>gases), 2.2                                                     | (2,154.6 kg)<br>4,750 | PAK 77.5         |
| 1                |              | 3          | AIR CONDITIONERS, FURNACES, SOLAR HEATING AND<br>COOLING EQUIPMENT, AND MATERIALS EQUIPMENT, AND<br>SUPPLIES USED IN THE MANUFACTURE, SALE, AND<br>DISTRIBUTION THEREOF. | 3                     | PAK 77.5         |
|                  |              | 6          | <b>Totals</b>                                                                                                                                                            | 9,503                 |                  |

The HAZMAT Hotline was contacted in 2007 to check if this format met the intent of (a)(i) and (a)(ii). Based on the positive verbal response received back in 2007 this format was implemented and used for the past 18 years with zero objections. We recently had one carrier object to the header \*\*\*\*\* DANGEROUS GOODS \*\*\*\*\* which is why I am requesting a formal interpretation.

As supplemental information:

- (a) the HAZMAT/DG line items are always listed first,
- (b) use of the term Dangerous Goods in the header is due to a large number of international shipments, and
- (c) the weight in kg was in response to a specific request from Transport Canada over a decade ago

Thank you,  
Robert (Bob) Johnson  
Manager, EHS  
Lennox Corporate  
2140 Lake Park Blvd. Richardson, TX 75080  
(o) +1 972-497-7532 (c) +1 972-569-7114

[www.lennox.com](http://www.lennox.com)



**§ 172.201 Preparation and retention of shipping papers.**

- (a) **Contents.** When a description of hazardous material is required to be included on a shipping paper, that description must conform to the following requirements:
- (1) When a hazardous material and a material not subject to the requirements of this subchapter are described on the same shipping paper, the hazardous material description entries required by § 172.202 and those additional entries that may be required by § 172.203:
    - (i) Must be entered first, or
    - (ii) Must be entered in a color that clearly contrasts with any description on the shipping paper of a material not subject to the requirements of this subchapter, except that a description on a reproduction of a shipping paper may be highlighted, rather than printed, in a contrasting color (the provisions of this paragraph apply only to the basic description required by § 172.202(a)(1), (2), (3), and (4)), or
    - (iii) Must be identified by the entry of an "X" placed before the basic shipping description required by § 172.202 in a column captioned "HM." (The "X" may be replaced by "RQ," if appropriate.)
  - (2) The required shipping description on a shipping paper and all copies of the shipping paper used for transportation purposes must be legible and printed (manually or mechanically) in English.
  - (3) Unless it is specifically authorized or required in this subchapter, the required shipping description may not contain any code or abbreviation.
  - (4) A shipping paper may contain additional information concerning the material provided the information is not inconsistent with the required description. Unless otherwise permitted or required by this subpart, additional information must be placed after the basic description required by § 172.202(a).