



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, DC 20590

January 27, 2026

Mr. Jeff McLaughlin  
Oak Harbor Freight Lines  
35615 N Arlington Rd  
Deer Park, WA 99006

Reference No. 25-0085

Dear Mr. McLaughlin:

This is in response to your June 24, 2025 letter and subsequent conversations with a member of my staff requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the requirements for an emergency response phone number to be provided on a shipping paper. You ask whether the emergency response phone number may be placed on a shipping paper—other than immediately following the description of a hazardous material—provided the emergency response number remains readily identifiable and in conformance with § 172.604. In your incoming letter, you provide a picture of a shipping paper with the emergency response phone number highlighted in yellow.

Yes. Provided the emergency response phone number is readily identifiable and in conformance with the requirements specified in § 172.604(b), such a configuration would meet the requirements of § 172.604(a)(3)(ii). However, your picture also includes a separate, non-emergency phone number immediately following the description of the hazardous material, a location usually associated with an emergency response telephone number. While your emergency response phone number location in the above scenario is not in violation of the HMR, the non-emergency phone number immediately following the hazardous materials description on your shipping papers could lead to confusion and miscommunication in an emergency scenario. This Office recommends that you either relocate the non-emergency phone number or place the emergency response number immediately following the hazardous materials description as outlined in § 172.604(a)(3)(i) to prevent frustration of your shipments.

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

Sincerely,

A handwritten signature in blue ink that reads "Alexander Wolcott".

Alexander Wolcott  
Acting Chief, Regulatory Review and Reinvention Branch  
Standards and Rulemaking Division

**From:** [INFOCNTR \(PHMSA\)](#)  
**To:** [Baker, Yul \(PHMSA\)](#)  
**Cc:** [Hazmat Interps](#)  
**Subject:** FW: 172.604 interpretation request  
**Date:** Tuesday, June 24, 2025 13:37:43  
**Attachments:** [image001.png](#)  
[3850\\_001\\_Redacted.pdf](#)

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Hi Yul,

Please see the below interpretation request and attachments.

Let us know if you need anything,

-Breanna

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**From:** Jeff McLaughlin <Jeff.McLaughlin@oakh.com>  
**Sent:** Tuesday, June 24, 2025 12:51 PM  
**To:** pipeline\_interp\_submittal <pipeline\_interp\_submittal@dot.gov>; INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>  
**Cc:** Jeff McLaughlin <Jeff.McLaughlin@oakh.com>; Tom Sanchez <tom.sanchez@oakh.com>  
**Subject:** FW: 172.604 interp request

**: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.**

Good morning,

I was following up as we have not received a response or acknowledgment on the request below.

Thank you,

Jeff

Jeff McLaughlin  
35615 N Arlington Rd  
Deer Park, WA 99006

**Jeff McLaughlin**  
*Pacific Northwest Safety Supervisor*  
[www.oakh.com](http://www.oakh.com) | C: 406-899-3085



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**From:** Jeff McLaughlin <[Jeff.McLaughlin@oakh.com](mailto:Jeff.McLaughlin@oakh.com)>

**Sent:** Tuesday, October 1, 2024 2:46 PM

**To:** [pipeline\\_interp\\_submittal@dot.gov](mailto:pipeline_interp_submittal@dot.gov)

**Cc:** Jeff McLaughlin <[Jeff.McLaughlin@oakh.com](mailto:Jeff.McLaughlin@oakh.com)>; Tom Mueller <[Tom.Mueller@oakh.com](mailto:Tom.Mueller@oakh.com)>; Joe Guzman <[Joe.Guzman@oakh.com](mailto:Joe.Guzman@oakh.com)>

**Subject:** 172.604 interp request

Good afternoon,

We are requesting an interpretation of 172.604(a)(3) regarding how an emergency response phone number must be entered on a hazardous materials shipping paper:

By utilizing ( option 1 ) outlined in 172.604(a)(3)(i) if the emergency response phone number is listed immediately following the description required by subpart C, do the requirements of 172.604(b) apply? Due to the word "or" following the criteria outlined in 172.604(a)(3)(i), and the addition of the language "entered once on a shipping paper in the manner prescribed in paragraph (b) of this section" under 172.604(a)(3)(ii) we feel that by utilizing ( option 1 ) we would not be required to meet the criteria outlined in 172.604(b) and our line manifest would be in compliance.

Please see the attached HM BOL in question. Thank you for your time and consideration of this matter.

Jeff

**Jeff McLaughlin**  
*Pacific Northwest Safety Supervisor*  
[www.oakh.com](http://www.oakh.com) | C: 406-899-3085



DSR189  
9/17/24

Oak Harbor Freight Lines

Manifest: 076 23918

Trailer: V2953S

Dest: 025

Freight Bill: 036-36169780



Freight Bill Date: 9/17/24

H/U	Pieces	Package	Haz	Item description	Lbs Weight
2	6	CR	X	UN3480, LITHIUM ION BATTERIES, CLASS 9 CRATE	2090 Hazardous
1	4	CR	X	UN3480, LITHIUM ION BATTERIES, CLASS 9 CRATE	1385 Hazardous

HAZARDOUS MATERIAL  
CONSIGNEE CONTACT PHONE NUMBER  
916-452-3111  
EMERGENCY CONTACT\* 800-424-9300  
CALIFORNIA COMPLIANCE SURCHARGE  
DEFICIT  
FUEL SURCHARGE 1525



DSR189  
9/17/24

Oak Harbor Freight Lines

Manifest: 076 23918

Trailer: V2953S

Dest: 032

Freight Bill: 031-37121079

Freight Bill Date: 9/17/24

Lbs  
Weight

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Item description

Haz

Package

Pieces

H/U

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\*\*\*\*\* SPECIAL DELIVERY REQUEST \*\*\*\*\*

DEL: BEFORE 16:00

1

1

1

RQ, UN3266, CORROSIVE LIQUID, BASIC  
INORGANIC, NOS, (SODIUM HYDROXIDE  
POTASSIUM HYDROXIDE), 8, PGII

X  
X  
X

TB

1

1

TOTES

X

TB

1

1

RQ, UN3264, CORROSIVE LIQUID,  
ACIDIC, INORGANIC, NOS, (NITRIC  
ACID, PHOSPHORIC ACID), 8, PGII

X  
X  
X

TB

1

1

TOTES

X

PT

1

2

UN3084, CORROSIVE SOLIDS,  
OXIDIZING, NOS, (SODIUM HYDROXIDE  
SODIUM CARBONATE PEROXYHYDRATE)

X  
X  
X

PT

1

1

8, (5.1), PG II

X

PT

1

1

DRUMS

X

PT

1

1

UN2014, HYDROGEN PEROXIDE, AQUEOUS

X

PT

1

1

SOLUTION 5.1 (8) II

X

PT

1

1

PAILS

X

PT

1

1

APPOINTMENT DELIVERY CHARGES

X

PT

1

1

/CALL FOR APPOINTMENT

X

PT

1

1

707 272 7761

X

PT

1

1

EMERGENCY CONTACT\*1-800-255-3924

X

PT

1

1

HAZARDOUS MATERIAL

X

PT

1

1

CALIFORNIA COMPLIANCE SURCHARGE

X

PT

1

1

FUEL SURCHARGE

X

PT

1

1

Hazardous

Hazardous

Hazardous

Hazardous

