



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

November 5, 2024

Johnny Johnson
The Whitaker Oil Company
1557 Marietta Road NW
Atlanta, GA 30318

Reference No. 24-0076

Dear Mr. Johnson:

This letter is in response to your August 29, 2024, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to a description of hazardous materials on a shipping paper. Specifically, you seek clarification and ask questions regarding the use of common industry names and abbreviations used for packages listed on a shipping paper.

We have paraphrased and answered your questions as follows:

- Q1. You ask whether the use of the abbreviation “1GCan” is permissible on a shipping paper to indicate a one gallon can.
- A1. The answer is yes. However, to avoid frustration of shipment and its information, we alternatively suggest “1 Gallon Can”, “One-Gallon Can”, or “1-Gal. Can” on a shipping paper.
- Q2. You ask whether the abbreviation “5GCan” is also permissible on a shipping paper to describe a package.
- A2. The answer is yes. See answer A1.
- Q3. You ask whether the abbreviation “Bulk T/T” is permissible on a shipping paper when shipping a hazardous material in a cargo tank motor vehicle (CTMV).

A3. The answer is yes. T/T is a commonly recognizable abbreviation for a tank truck. Note however, the term “bulk” does not need to be included before “T/T.” A T/T—or tank truck—is synonymous with a CTMV, which is considered a bulk packaging. Therefore, a person may annotate “T/T” on a shipping paper to indicate the packaging type.

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

Sincerely,

Dirk Der Kinderen
Chief, Standards Development Branch
Standards and Rulemaking Division

Jones, Jessie Jane CTR (PHMSA)

From: INFOCNTR (PHMSA)
Sent: Thursday, August 29, 2024 4:56 PM
To: Dodd, Alice (PHMSA)
Cc: Hazmat Interps
Subject: FW: Request a formal letter of interpretation

Importance: High

Follow Up Flag: Follow up
Flag Status: Flagged

Hello Alice,

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

Sincerely,
Janaye

From: Johnny Johnson <Johnny.Johnson@whitaker.company>
Sent: Monday, August 26, 2024 5:54 AM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Subject: Request a formal letter of interpretation
Importance: High

CAUTION: 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.

I respectfully request your assistance, I was hoping someone could help as a concern has come up with one of our carriers --- I realize that the word "drum" is used in container types in regulation but industry is allow to use common industry names and abbreviations – so a 1 gallon can/jug would be a 1 gallon drum per regulation as below ---

HM-201 - Example

STRAIGHT BILL OF LADING
ORIGINAL - NOT NEGOTIABLE

Shipper No. _____
Carrier No. _____
Date _____

Page _____ of _____ (Name of carrier) (SCAC)

TO: _____
Consignee _____
Street _____
City _____ State _____ Zip Code _____

FROM Shipper **ABC Hazmat Co.**
Street _____
City _____ State _____ Zip Code _____
Tel. No. Emergency Contact Tel. No. **1-800-555-2222**

Route	No. of Units & Container Type	HM	BASIC DESCRIPTION Proper Shipping Name, Hazard Class, Identification Number (UN or NA), Packing Group, per 172.101, 172.202, 172.203	TOTAL QUANTITY (Weight, Volume, Gallons, etc.)	WEIGHT (Subject to Correction)	RATE	CHARGES (For Carrier Use Only)
	1 Box		Carriage bolts	1000			
	4 Drums	X	UN1805, Phosphoric acid solution, 8, PGIII	4 gal			
	1 Drum	X	UN1993, Flammable liquids, n.o.s., (contains methanol), 3, PGIII	18 gal			
	This shipment is within limitations for Cargo Aircraft only						

Name of Offeror (shipper) when number is person offering

Placement options for Contract No. xxxx or Name of Offeror (shipper) who hired service provider

§172.201; §172.604(a)(3)

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Question #1 -- At issue is our use of "1GCan" to indicate a 1 gallon can – is it permissible? (like a gas "can") I pulled a screen shot from PHMSA as a "Can" being used as a container type (ExbtB) --- so what is being shipped in 4 one gallon cans of MEK -- is this permissible ?? We never had an issue before even in house inspections from PHMSA but our carrier said an inspector at a roadside inspection that it was not acceptable... copy of our BOL is exbt-A

ExbtA

4	4		1GCan	X	UN1193, Methyl Ethyl Ketone 3, PGII METHYL ETHYL KETONE 1 x 1 Gallon Case 586365 1GCan	27	29
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ExbtB

Additional Descriptions

250743-02

ATTENTION SHIPPERS! FREIGHT CHARGES ARE PREPAID ON THIS BILL OF LADING UNLESS MARKED COLLECT.

STRAIGHT BILL OF LADING
ORIGINAL - NOT NEGOTIABLE

Shipper No. _____
Carrier No. _____

“This shipment is within limitations for Cargo Aircraft only”

Street _____		City _____	State _____	Zip Code _____		
City _____		State _____	Zip Code _____	24 Hr. Emergency Contact Tel. No. _____		
Route _____		Vehicle Number _____				
No. of Units & Container Type	HM	BASIC DESCRIPTION <small>Proper Shipping Name, Hazard Class, Identification Number (UN or NA), Packing Group, per 172.501, 172.502, 172.503</small>	TOTAL QUANTITY <small>(Weight, Volume, Gallons, etc.)</small>	WEIGHT <small>(Subject to Correction)</small>	RATE	CHARGES <small>(For Carrier Use Only)</small>
1 Box	X	RQ, UN1387, Copper cyanide, 6.1, PGII, Marine Pollutant	10 lbs			
30 cans	X	UN1805, Phosphoric acid solution, 8, III DOT SP- 15890	30 gals			
2 totes	X	UN1587, Copper Cyanide, 6.1, II "residue last contained"	residue			

\$172.203



U.S. Department of Transportation
Pipeline and Hazardous Materials
Safety Administration

To Protect People and the Environment From the Risks of
Hazardous Materials Transportation

Question #2 – When shipping a gallon container is the abbreviation “5GCan” permissible..

Question #3 -- when shipping by Tank Truck it is permissible to use the abbreviation “Bulk T/T”

Johnny Johnson
Whitaker Compliance
404-605-8797 cell 678-386-2658