



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

1200 New Jersey Avenue, SE
Washington, DC 20590

March 11, 2026

Mr. Tad Rumas
Public Utilities Commission
180 E Broad Street
Columbus, Ohio 43215

Reference No. 25-0090

Dear Mr. Rumas:

This letter is in response to your July 2, 2025 email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to additional shipping paper description information for radioactive materials. It is your understanding that § 172.203(d) appears to indicate that *all* additional information (*i.e.*, “entries”) must immediately follow the basic description required by § 172.202. However, you note that § 172.203(d)(9)(ii) states that an “Exclusive Use Shipment” may be entered only once on the shipping paper in a clearly visible location” and § 172.203(d)(10) states that for the shipment of a package containing a highway route controlled quantity of Class 7 (radioactive) materials the words “Highway route controlled quantity” or “HRCQ” must be entered in association with the basic description, while §§ 172.203(d)(1)–(d)(8) provide no such specificity.

We have paraphrased and answered your questions as follows:

- Q1. Does the phrase “[t]he description for a shipment of a Class 7 (radioactive) material must include the following additional entries” in § 172.203(d) indicate that the additional information (*i.e.*, entries) must immediately follow the basic description (to include horizontal or vertical format) only?
- A1. No. As stated in § 172.203(d), the phrase indicates that the information required by this paragraph, unless specifically instructed otherwise, is considered additional description information and must be a part of the hazardous material description for the radioactive material, but not necessarily immediately before or after the basic description.
- Q2. Regarding the requirement for a highway route controlled quantity package in § 172.203(d)(10), does the phrase “in association with” indicate that the additional information must immediately follow the basic description (to include horizontal or vertical format) only?

- A2. No. The phrase “in association with the basic description” means placing additional information as part of the basic description either immediately before, after, or interspersed with the basic description. See, for example, the instructions for including a technical name in § 172.203(k) and the examples provided.
- Q3. Based on the answers to Q1 and Q2, would it be permissible for information required by § 172.203(d)(1)–(d)(8) to be in another location on the shipping paper?
- A3. No. Section 172.203(d) specifies that the information must be included as part of the hazardous material description for the radioactive material.
- Q4. Regarding the requirement for a highway route controlled quantity package in § 172.203(d)(10), and based on the answers to Q1 and Q2, when is information no longer considered “in association with” the basic description?
- A4. See answer A2.
- Q5. Based on the answers to Q1 and Q2, when are entries considered “not included” with the basic description?
- A5. Regarding the requirement in § 172.203(d) for the shipment description to include the following additional entries, the term “entries” means information. As stated in answer A1, the additional information, as appropriate, must be included in the hazardous material description, not the basic description (as spelled out in § 172.202(b)).

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

From: [INFOCNTR \(PHMSA\)](#)
To: [Baker, Yul \(PHMSA\)](#)
Cc: [Hazmat Interps](#)
Subject: FW: Written Interpretation Request
Date: Wednesday, July 2, 2025 13:36:25
Attachments: [image001.png](#)
[image002.png](#)

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 tad.rumas@puco.ohio.gov. [Learn why this is important](#)

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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 must include the following additional entries as appropriate” which appears to indicate that all 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

include” indicate that the additional information must immediately 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 immediately 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.

No. of Units & Container Type	HM	Proper Shipping Name, Hazard Class, UN or NA Number, Packing Group	Line Item Weight(Kg)
1 Cask	RQ	UN3328, Radioactive material, Type B(U) package, fissile, Class 7 RQ U02 Clad in Zirconium Alloy Solid Metal Radionuclides: Pu 238, Cm 244, Pu 241, Am 241, Ru 106, Cs 144, Pu 240, Cm 242, Pu 239 Package: USA/9225/B(U)F-96, Revision TI: 0.1 Label: Yellow-III Fissile CSI: 0.0	

Thank you in advance,



Tad Rumas

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Motor Carrier Enforcement Division

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