



STATE OF WASHINGTON

DEPARTMENT OF HEALTH

OFFICE OF RADIATION PROTECTION

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711 Washington Relay Service*

March 4, 2026

Mr. Shane Kelley
Director, Standards and Rulemaking Division
U.S. DOT/PHMSA (PHH-10)
1200 New Jersey Avenue, SE East Building, 2nd Floor
Washington, DC 20590

Subject: Request for Interpretation – Placarding of Bulk LSA Packages Transported Under Exclusive Use

Dear Mr. Kelley,

The Washington State Department of Health (department), Office of Radiation Protection, requests a written interpretation of the Hazardous Materials Regulations (49 CFR Parts 171–180) regarding placarding requirements for bulk packages containing Class 7 low specific activity (LSA) material transported under exclusive-use provisions.

The department seeks clarification as to whether a bulk packaging (e.g., B-25 box) containing LSA material and consigned to exclusive use must be placarded in accordance with 49 CFR § 172.514, or whether placarding of the conveyance alone satisfies the requirements of Subpart F of Part 172.

PHMSA Letter of Interpretation Ref. No. 10-0032, dated April 2, 2010, addressed this issue in Scenario 3 and concluded that bulk packages transported under exclusive use must be placarded in addition to the transport vehicle.

Since issuance of LOI 10-0032, PHMSA adopted amendments to the Hazardous Materials Regulations in the July 11, 2014, final rule (79 Fed. Reg. 40624). Certain stakeholders have asserted that these amendments modified the placarding requirements such that bulk packages containing LSA material transported under exclusive use are no longer required to display placards if the conveyance is properly placarded.

Accordingly, the department requests clarification of the following:

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1. Under the current regulations, does 49 CFR § 172.514 require a bulk package containing LSA material and consigned to exclusive use under § 173.427(b)(4) to be placarded with Class 7 RADIOACTIVE placards?
2. Does PHMSA consider LOI Ref. No. 10-0032 (April 2, 2010) to remain valid under the post-2014 regulatory framework? If not, please identify the specific regulatory amendment that superseded that interpretation.

The department seeks this clarification to ensure consistent and accurate application of federal transportation requirements.

Sincerely,

A handwritten signature in black ink, appearing to read 'Gregorio Rosado', with a stylized flourish at the end.

Gregorio Rosado,
Project Lead, Low-Level Radioactive Waste Program
Office of Radiation Protection
Washington State Department of Health
Email: gregorio.rosado@doh.wa.gov