



Cajar, J.
26-0033

Fwd: 3M Springfield 49 CFR Interpretation

1 message

INFOCNTR (PHMSA) <infocntr.infocntr@dot.gov>

Wed, Mar 11, 2026 at 3:31 PM

To: "Baker, Yul (PHMSA)" <yul.baker@dot.gov>, Hazmat Interps <hazmatinterps@dot.gov>

Good afternoon,

Please see the below interpretation request.

Let us know if you need anything,

Janaye

----- Forwarded message -----

From: **Katie Cameron** <kcameron4@mmm.com>

Date: Wed, Mar 11, 2026 at 8:40 AM

Subject: 3M Springfield 49 CFR Interpretation

To: infocntr@dot.gov <infocntr@dot.gov>

Cc: Brooke MacMillan <bmacmillan@mmm.com>, Richard Braun <rbraun4@mmm.com>

To Whom it may concern,

At the 3M Springfield site, Clean Harbors (Hazardous Waste Carrier and disposal vendor) loads totes, drums and pails onto a Clean Harbors trailer and then moves the loaded and ready for shipment trailers to an area where they are parked for an average of 7 days while awaiting shipment. At 3M, we want clarity on if the incidental storage of these trailers falls under DOT (49 CFR) or if it falls under NFPA 30, requiring secondary containment.

49 CFR 171.8 states "Storage incidental to movement means storage of a transport vehicle, freight container or package containing a hazardous material by any person between the time that a carrier takes physical possession of the hazardous material for the purpose of transporting it in commerce until the package containing the hazardous material is physically delivered to the destination indicated on a shipping document"

Would these trailers that are awaiting shipment on 3M property fall under this section of code, meaning this storage area is governed by DOT? Does the storage area being on 3M property negate this section from applying?

Additionally, 49 CFR 171.1 states "Transportation of a hazardous material in commerce begins when a carrier takes physical possession of the hazardous material for the purpose of transporting it and continues until the package containing the hazardous material is delivered to the destination indicated on shipping document." Section C2 in this code also states ""For a bulk packaging, loading incidental to movement is filling the packaging with a hazardous material for the purpose of transporting it when performed by carrier personnel or in the presence of carrier personnel."

Since Clean Harbors is our carrier and they also load the trailers on the dock, would this mean that clean harbors has physical possession of the hazardous material and DOT regulations apply to this trailer once it is loaded and a shipping document is printed? Additionally, once clean harbors starts loading a hazardous waste trailer, they are loading it with the intent of transporting the trailer.

Best,

Katie Cameron

Resident Project Engineer

Engineering | Enterprise Supply Chain

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