



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

April 2, 2026

Mr. Andrew Zikmund
Compliance Specialist
O.D.O.T. Commerce and Compliance Division
5920 Highway
30 Huntington, OR 97907

Reference No. 26-0026

Dear Ms. Zikmund:

This letter is in response to your February 17, 2026 email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the shipping paper and marking requirements of non-odorized liquefied petroleum gas (LPG).

We have paraphrased and answered your questions as follows:

- Q1. Does the requirement in § 172.203(p) to enter the word “non-odorized” or “not-odorized” on a shipping paper apply to non-odorized shipments of “UN1011, Butane,” “UN1978, Propane,” and “UN1077, Propylene”?
- A1. Yes. LPG includes gases composed predominantly of the following either by themselves or as mixtures: butane, isobutane, propane, propylene (propene), butylenes (butenes).¹ Section 172.203(p) states that the word “non-odorized” or “not-odorized” must be included in association with the proper shipping description on a shipping paper when non-odorized LPG is offered for transportation. If the non-odorized gas or gas mixture meets the definition of LPG, then the shipping description must include “non-odorized” or “not-odorized” regardless of whether the assigned proper shipping name is specifically “Petroleum gases, liquefied or Liquefied petroleum gas.”
- Q2. Does the marking requirement for “NON-ODORIZED” or “NOT ODORIZED” apply to these specific gases when offered in cylinders, portable tanks, or cargo tanks?
- A2. Yes. The marking requirements in § 172.301(f) for cylinders, § 172.326(d) for portable tanks, and § 172.328(e) for cargo tanks apply to any non-odorized gas or gas mixture that meets the definition of LPG. Just as with the shipping paper requirements, if the LPG is

¹ 49 FR 64462, 64463 (Nov. 4, 2004).

offered for transportation without odorization, the package must be marked "NON-ODORIZED" or "NOT ODORIZED" as specified in the applicable section.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Dirk Der Kinderen". The signature is fluid and cursive, with a prominent initial "D".

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

From: [INFOCNTR \(PHMSA\)](#)
To: [Baker, Yul \(PHMSA\)](#)
Cc: [Hazmat Interps](#)
Subject: FW: Request for letter of interpretation
Date: Wednesday, February 18, 2026 16:09:43

Good afternoon,

Please see the below interpretation request.

The mailing address is:
ODOT C.C.D. attn: Andrew Zikmund
5920 Highway 30
Huntington, OR 97907

Let us know if you need anything,

Janaye

From: ZIKMUND Andrew G <Andrew.G.ZIKMUND@odot.oregon.gov>
Sent: Tuesday, February 17, 2026 6:15 PM
To: PHMSA HM InfoCenter <PHMSAHMInfoCenter@dot.gov>
Subject: Request for letter of interpretation

You don't often get email from andrew.g.zikmund@odot.oregon.gov. [Learn why this is important](#)

Info Center:

This is a request for a written interpretation of the applicability of certain regulations as they apply to shipments of non-odorized liquefied petroleum gas.

1. 49CFR part 172.203(p) requires the word “non-odorized” or “not-odorized” to be entered in association with the proper shipping description on a shipping paper when non-odorized LPG is offered for transportation. Would part 172.203(p) apply also to non-odorized shipments of: **UN1011, Butane, 2.1?** non-odorized shipments of **UN1978 propane, 2.1?** and non-odorized shipments of **UN1077 Propylene, 2.1?**
2. I would ask the same question with regards to 49CFR part 172..301(f) for cylinder marking , 172.326(d) for portable tank marking and 172.328(e) for cargo tank marking.

Thank you for your assistance with these questions.

Andrew Zikmund

Compliance Specialist

O.D.O.T. Commerce and Compliance Division

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