



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

May 18, 2026

Mr. Kristopher Bowen
National Transportation Consultants
9761 Crosspoint Blvd., Suite 100
Indianapolis, IN 46256

Reference No. 25-0132

Dear Mr. Bowen:

This is in response to your October 1, 2025 letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the transportation of lithium batteries contained in equipment. Specifically, you request clarification on the labeling and marking requirements for an unpackaged riding mower containing a large lithium battery transported on a trailer.

Under § 173.22, it is the shipper's responsibility to classify a hazardous material properly, in accordance with classification criteria provided in the HMR, prior to offering it for transportation to—or within—the United States. This Office does not normally perform this function. However, based on the scenario in your letter, the riding mower may be described under the Hazardous Materials Table (HMT) entry “UN3171, Battery-powered vehicle or Battery-powered equipment, 9.” When transported in accordance with the provisions of § 173.220, these vehicles are excepted from the marking and labeling requirements of 49 CFR Part 172, Subparts D and E. See §§ 173.220(h)(2) and 172.102, Special Provision 134.

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

Sincerely,

A handwritten signature in blue ink that reads "Alexander Wolcott".

Alexander Wolcott
Acting Chief, Regulatory Review and Reinvention Branch
Standards and Rulemaking Division

From: [INFOCNTR \(PHMSA\)](#)
To: [Baker, Yul \(PHMSA\)](#)
Cc: [Hazmat Interps](#)
Subject: FW: Letter of Interpretation Request - Official Request for Guidance
Date: Wednesday, October 1, 2025 14:25:12
Attachments: [image.png](#)

Hi Yul,

Please see the below interpretation request.

Let us know if you need anything.

Thanks,
Janaye

From: Kristopher J. Bowen <kbowen@ntconsult.com>
Sent: Wednesday, October 1, 2025 7:22 AM
To: PHMSA HM InfoCenter <PHMSAHMInfoCenter@dot.gov>
Subject: Official Request for Guidance

You don't often get email from kbowen@ntconsult.com. [Learn why this is important](#)

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.

Good morning,

I received a call from the info center to re-submit this request as an official request for guidance. We are requesting a guidance letter to keep on file in the case of future incorrect violations being cited.

Thank you,

Kristopher Bowen
National Transportation Consultants
9761 Crosspoint Blvd., Suite 100
Indianapolis, IN 46256
706-533-0464



From: Kristopher J. Bowen

Sent: Monday, August 18, 2025 9:14 AM

To: phmsa.hm-infocenter@dot.gov <phmsa.hm-infocenter@dot.gov>

Subject: Lithium Battery Guidance

Good morning,

Our services were recently retained by a manufacturer of lithium ion battery powered lawn equipment. They are in the process of building trailers to transport their products to trade shows and product demonstrations for the lawncare industry. We have determined that their lawncare equipment would be classified as UN3481 Lithium Ion Batteries Contained in Equipment. Regulation is pretty straightforward from there and the PHMSA Lithium Battery Guide is very helpful so thank you for create such an easy to follow guide. I do have one question that I do not feel is explained however. In guide 03 of that document, on page 18, is the following note:

- For lithium batteries contained in equipment: The outer packaging does not need to be UN Specification packaging - in fact, the equipment can be transported unpackaged if it provides adequate protection to the battery.

That would be the case in this instance. For example, one of the pieces of equipment is a riding lawnmower that is powered by, and contains during transportation, a large lithium battery. The mower is loaded into the trailer and secured with tiedowns as required, however, there is no packaging.

My request for interpretation is in the marking and labeling requirements. Since there is no packaging, how do the labeling and marking requirements apply? I do not see a way to be in compliance other than marking and labeling each piece of lawn equipment which is not feasible. Your guidance in this matter is greatly appreciated.

Thank you,

Kristopher Bowen
National Transportation Consultants
9761 Crosspoint Blvd., Suite 100
Indianapolis, IN 46256
706-533-0464

