



26-0090
Pollack

Pollack, Arthur <arthur.pollack@dot.gov>

Fwd: FW: Questions about lithium ion batteries in large packagings

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

Fri, Jul 10, 2026 at 2:17 PM

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

Cc: Hazmat Interps <hazmatinterps@dot.gov>

Good afternoon,

Please see the following Letter of Interpretation request. This request is about hazard communication on a large battery packaging. It is the question I asked about in the 7/8 interpretation meeting chat. HMIC relayed the guidance from Standards and Ms. Absher requested a response in writing. Let me know if you need anything else.

Best,

Aminah

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

From: **Kristie Absher** <kabsher@ercweb.com>

Date: Fri, Jul 10, 2026 at 7:57 AM

Subject: FW: Questions about lithium ion batteries in large packagings

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

Dear Representative:

After speaking with Jonathon at the information center yesterday, I'd like to request a written interpretation from PHMSA.

Is submitting this email sufficient for that purpose or do I need to send my questions via another method?

Thank you,

Kristie Absher
Environmental Resource Center
[501 W. Williams Street #1007](#)

[Apex, NC 27502](#)

800-537-2372 x 402
919-342-0807 fax

kabsher@ercweb.com

<https://ercweb.com>

Compliance made simple—find the perfect training solution for your team at ercweb.com.

From: Kristie Absher
Sent: Wednesday, July 8, 2026 12:14 PM
To: phmsa.hm-infocenter@dot.gov
Subject: Questions about lithium ion batteries in large packagings

Dear Hazardous Materials Information Center Representative:

I have a few questions regarding the marking and labeling requirements for **UN 3480, Lithium ion batteries, Class 9** when transported in a UN large packaging (approximately 130 cubic feet) authorized under **49 CFR 173.185(b)(6)**.

Section **49 CFR 172.336(d)** states that when bulk packagings are labeled instead of placarded in accordance with **49 CFR 172.514(c)**, the identification number (i.e., **3480**) may be displayed in compliance with **49 CFR 172.301(a)(1)**.

If I use Lithium Battery labels in place of Class 9 placards (which are not required for Class 9 materials transported domestically), I would appreciate your guidance on the following questions:

1. **How many Lithium Battery labels are required on the large packaging?** Are the labels required on two sides or two ends of the large packaging, or is a single label on one side or end sufficient?

My interpretation is that, because the large packaging has a volume of approximately 130 cubic feet, **49 CFR 172.406(e)(1)** requires labels to be displayed on two opposing sides or two opposing ends. Therefore, displaying only one Lithium Battery label would not comply with the regulations.

2. **Is the proper shipping name, "Lithium ion batteries," required to be marked on the large packaging?**

My interpretation is that the answer is **no**. Section **49 CFR 172.336(d)** specifies that the identification number may be displayed in accordance with **49 CFR 172.301(a)(1)**. However, I have not found any requirement in **49 CFR 172.331**, **172.336(d)**, **172.514(c)(5)**, or any other applicable section that requires the proper shipping name to be marked on this type of large packaging.

I appreciate your review of these questions and any guidance you can provide.

Thank you for your time and assistance,

Kristie Absher
Environmental Resource Center
[501 W. Williams Street #1007](#)
[Apex, NC 27502](#)

800-537-2372 x 402
919-342-0807 fax

kabsher@ercweb.com

<https://ercweb.com>

Compliance made simple—find the perfect training solution for your team at ercweb.com.