



Fwd: UN2031 LOI

1 message

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

Thu, Jul 30, 2026 at 2:37 PM

Good afternoon,

Please see the following request for a letter of interpretation. Let us know if you need anything.

Best,

Aminah

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

From: **Hazmat Approval Group at PHX** <HApprovalGroup@matson.com>

Date: Thu, Jul 30, 2026 at 12:08 PM

Subject: RE: UN2031 LOI

To: INFOCNTR (PHMSA) <infocntr.infocntr@dot.gov>, Hazmat Approval Group at PHX <HApprovalGroup@matson.com>

Physical mailing address is:

3426 E Libby St

Phoenix, AZ 85032

NOTE: Approval of Shipping Papers is always subject to the Port/Vessel's ability to accommodate the dangerous goods with other commodities, stowage restrictions and permit requirements.

For assistance from the DG Team after 8PM PST please call a member of the team directly.



James Owen | Manager Dangerous Goods | SQES I MBA

jowen@matson.com | Tel: 480-653-1114

Matson.com



From: INFOCNTR (PHMSA) <infocntr.infocntr@dot.gov>
Sent: Thursday, July 30, 2026 8:01 AM
To: Hazmat Approval Group at PHX <HApprovalGroup@matson.com>
Subject: Re: UN2031 LOI

Dear James,

We have received your request for a written letter of interpretation regarding the hazardous materials regulations (49 CFR Parts 171-180). The hazardous materials regulations are available at the following URL:

<https://www.phmsa.dot.gov/phmsa-regulations>

However, before we can submit your request for processing, please respond to this email with:

- Physical Mailing Address

Sincerely,

Aminah, Hazardous Materials Specialist

An e-mail response from this office is considered informal guidance. Formal guidance may be requested in accordance with 49 CFR 105.20. <https://www.phmsa.dot.gov/standards-rulemaking/hazmat/hazardous-materials-information-center>

On Wed, Jul 29, 2026 at 7:22 PM Hazmat Approval Group at PHX <HApprovalGroup@matson.com> wrote:

PHMSA Team,

This has become a repeat issue for our company and we would like a Letter of Interpretation not only for us but for the terminal operating company as well.

Under the IMDG Code, the UN2031 entry without a subclass 5.1 only carries stowage codes SG36 and SG49. It is not split into two based on the percentage of nitric acid.

SG36 Stow "separated from" SGG18 – alkalis.

SG49 Stow "separated from" SGG6 – cyanides.

This entry causes confusion because 49CFR splits it in two and the first one has stowage codes 89 under 176.84.

89	Segregation same as for oxidizers.
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While 49CFR allows for the use of the IMDG Code, it also notes that usage must conform to all applicable requirements of 49CFR, which is a bit of a circle in this case. The additional italics portion of the proper shipping name is not required to be declared so there is no way for a carrier to know which entry is being used under 49CFR. The default is to use the IMDG version that is not divided.

How should segregation be taken into consideration when the shipper does not provide the italics portion of the proper shipping name? Can the IMDG stowage codes be used?

(b) Limitations on the use of international standards and regulations. A hazardous material that is offered for transportation or transported in accordance with the international standards and regulations authorized in paragraph (a) of this section—

(1) Is subject to the requirements of the applicable international standard or regulation and must be offered for transportation or transported in conformance with the applicable standard or regulation; and

(2) Must conform to all applicable requirements of this subpart. (which would seem to indicate that stowage code 89 must be applied, but again, how would a carrier know this when the italics portion of the PSN is not required and there is no requirement to provide that information on shipping papers)

This issue is causing difficulties for our shippers when loading containers and for our planner when loading the vessel. Please clarify if UN2031, Nitric acid, 8, II can be stowed subject to only SG36 and SG49 as outlined in the IMDG Code's HMT.

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jowen@matson.com | Tel: 480-653-1114

Matson.com



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