



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

NOV 06 2018

Clayton Droste
Nutrien
3005 Rocky Mountain Avenue
Loveland, CO 80534

Reference No. 18-0068

Dear Mr. Droste:

This letter is in response to your May 9, 2018, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the requirements for describing a hazardous material on a shipping paper. Specifically, you ask if “CA” is an acceptable abbreviation for the word “case” when describing the type of packaging on a shipping paper.

The answer is no. Section 172.202(a)(7) allows for the use of abbreviations to indicate the type of packaging on a shipping paper provided that the abbreviations are commonly accepted and recognizable. It is the opinion of this Office that “CA” is not a commonly recognizable abbreviation for the word “case.”

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Dirk Der Kinderen', written over the typed name.

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

Ciccarone
Labeling
18-0068

January, Ikeya CTR (PHMSA)

From: INFOCNTR (PHMSA)
Sent: Wednesday, May 09, 2018 5:22 PM
To: Hazmat Interps
Subject: FW: Interpretation question

Hi Ikeya & Alice,

Below is a request for a letter of interpretation. Mr. Droste spoke with Breanna about his question. Please let me know if you have any questions.

Thanks,
Jodi

From: Clay Droste [<mailto:Clay.Droste@nutrien.com>]
Sent: Wednesday, May 9, 2018 11:34 AM
To: Gale, John (PHMSA) <john.gale@dot.gov>
Subject: Interpretation question

John,

I got your email address from the PHMSA website and would like some clarification. Nowhere in the regulation does it give proper abbreviations for packages but allows for abbreviations in 172.202(a)(7). We have been audited by several Federal auditors and never had an issue with our shipping papers. I'm now having an issue with the use of CA as an abbreviation for the word Case. For example, 1CA, for 1 Case. Again, this has never been an issue. Would you be so kind to share your opinion with me on this matter?

I appreciate your time and expertise in this matter.

Thanks,

Clayton Droste

Advisor, Commercial Vehicle Compliance
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