



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

May 10, 2021

James Owen
Dangerous Goods Specialist
Safety, Quality, Environment, and Security
Matson Navigation Company
426 N 44th St, Ste 250
Phoenix, AZ 85008

Reference No. 21-0024

Dear Mr. Owen:

This letter is in response to your March 9, 2021, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the use of italicized text and plural versus singular shipping names on shipping papers. Specifically, you ask:

- Q1. Section 172.101(c)(2) states that words in italics are not part of the proper shipping name, but may be used in addition to the proper shipping name. You ask whether someone may use only a portion of the italicized text.
- A1. In general, the answer is yes. However, use of only part of the italicized text is not advised as it may misrepresent the hazard and cause frustration of your shipment. For example, the Hazardous Materials Table (HMT; § 172.101) entry “UN2037, Receptacles, small, containing gas *or gas cartridges (oxidizing), without release device, not refillable and not exceeding 1 L capacity*” may not be represented on a shipping paper as “UN2037, Receptacles, small, containing gas (oxidizing), without release device, not refillable and exceeding 1 L capacity.”
- Q2. You ask whether it is acceptable to enter a shipping description as singular when the HMT entry is plural. In your email, you provide the example of “fire extinguishers” entered as “fire extinguisher.”

A2. The answer is yes. Section 172.101(c)(1) states that proper shipping names may be used in the singular or the plural and in either upper or lower case letters. Therefore, a shipper may enter the proper shipping names on a shipping paper in the singular or plural form. For example: “UN1044, Fire extinguishers” or “UN1044, Fire extinguisher” is acceptable.

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 "T. Glenn Foster". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

T. Glenn Foster
Chief, Regulatory Review and Reinvention Branch
Standards and Rulemaking Division

From: [INFOCNTR \(PHMSA\)](#)
To: [Dodd, Alice \(PHMSA\)](#); [Hazmat Interps](#)
Subject: FW: LOI - proper shipping names
Date: Tuesday, March 9, 2021 12:44:30 PM

Hi Alice,

Please see the below interpretation request. Should you have any questions, please do not hesitate to reach out.

Regards,

-Breanna

From: James Owen at PHX x5015 <JOwen@matson.com>
Sent: Wednesday, March 3, 2021 3:46:12 PM
To: PHMSA Website Manager <PHMSAWebsiteManager@dot.gov>
Subject: LOI - proper shipping names

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Good afternoon,

I am writing to request a letter of interpretation on two items that both relate to the proper shipping name on a shipping paper.

My first question is in regards to the entry in italics from the HMT. I understand that the italics portion is allowable but not mandatory. My question is, if someone uses only a portion of the italics is that still acceptable? An example is Aerosols. Would "Aerosols, flammable" be acceptable or since a portion of the italics is being used (flammable), would the rest of the entry (each not exceeding 1 L capacity) be required as well?

The second question is in relation to singular vs plural. I understand that if an entry is singular in the HMT it can also be plural when noted on the shipping papers. Is this true of the inverse? For example can "Fire extinguishers" be declared as "Fire extinguisher"?

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