



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

1200 New Jersey Avenue, SE
Washington, DC 20590

May 6, 2022

Tom Forbes
Chief, Motor Carrier Enforcement Division
Public Utilities Commission of Ohio
180 E. Broad Street, Suite 421
Columbus, OH 43215

Reference No. 22-0008

Dear Mr. Forbes:

This letter is in response to your February 4, 2022, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the domestic transportation of “UN1978, Propane, 2.1” as “UN1075, Propane, 2.1” in accordance with Special Provision (SP) 19.

We have paraphrased and answered your questions as follows:

- Q1. You ask whether transporting “UN1978, Propane, 2.1” as “UN1075, Propane, 2.1” in accordance with SP 19 requires a person to indicate on a shipping paper “NONCORROSIVE” or “NONCOR,” “NOT FOR Q and T TANKS,” or would this only be applicable when “UN1075” is described and shipped as “liquefied petroleum gas.”
- A1. When using the UN identification number “1075” in accordance with SP 19 or otherwise, the marking requirements of § 172.203(h)(2) are applicable. Therefore, shipping papers for applicable packagings must include the words “NONCORROSIVE,” “NONCOR,” or “NOT FOR Q and T TANKS”—as appropriate—in accordance with § 172.203(h)(2).
- Q2. You ask whether transporting “UN1978, Propane, 2.1” as “UN1075, Propane, 2.1” in accordance with SP 19 requires a person to mark the cargo tank as propane in accordance with § 172.328(b) to match the shipping paper or does the cargo tank have to be marked as liquefied petroleum gas.

A2. When transporting “UN1075, Propane, 2.1” domestically in accordance with SP 19, a person is permitted to mark a cargo tank as either propane or liquefied petroleum gas, provided that the UN identification number is consistent on package markings, shipping papers, and emergency response information as required by SP 19.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Dirk Der Kinderen". The signature is fluid and cursive, with a large initial "D" and "K".

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

Baker

From: [INFOCNTR \(PHMSA\)](#)
To: [Dodd, Alice \(PHMSA\)](#)
Cc: [Hazmat Interps](#)
Subject: FW: Written Interpretation Request
Date: Wednesday, February 9, 2022 1:31:45 PM
Attachments: [image001.png](#)
[image002.png](#)

22-0008

Hi Alice,

Please see the below interpretation request.

Let me know if you need anything.

Regards,

-Breanna

From: tom.forbes@puco.ohio.gov <tom.forbes@puco.ohio.gov>
Sent: Friday, February 4, 2022 8:54 AM
To: PHMSA HM InfoCenter <PHMSAHMInfoCenter@dot.gov>
Subject: Written Interpretation Request

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.

Info Center:

This is a request for a written interpretation on the two questions posed below dealing with special provision 19 when transporting propane and using UN 1075 ID Number and markings.

1. When transporting UN1075 propane as allowed by Special Provision 19 am I required to mark the shipping paper per 172.203(h)(2) either non-corrosive / non-corr or Not for Q and T Tanks or does this only apply when UN1075 is shipped as Liquefied Petroleum Gas?
2. When transporting UN1075 propane as allowed by Special Provision 19 does the cargo tank have to be marked Propane per 172.328(b) to match the shipping paper Propane or is it allowed to be marked as liquified petroleum gas?

Thanks you for your assistance with these questions.

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