



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

1200 New Jersey Avenue, SE  
Washington, DC 20590

October 3, 2022

Joe Strelow  
Operations Manager  
Rinchem Company, Inc  
917 Lone Oak Rd, Ste 100  
Eagan, MN 55121

Reference No. 22-0040

Dear Mr. Strelow:

This letter is in response to your May 3, 2022, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to proper shipping names (PSNs). Specifically, you provide the example of “UN1219, Isopropanol *or* Isopropyl alcohol, 3, PG II” where Column (2) of the § 172.101 Hazardous Materials Table (HMT) lists both “Isopropanol” and “Isopropyl alcohol” in Roman type as PSN alternatives. You ask whether a shipper may use both—at the same time—for the shipping description of a hazardous material required by § 172.202 or whether the intent is to use only one at a time.

The intent of the shipping description requirements is to include the one PSN that most appropriately describes the material. For example, for “UN3164, Articles, pressurized pneumatic *or* hydraulic *containing non-flammable gas, 2.2*” the selected PSN must indicate whether the article is pneumatic or hydraulic—it cannot be both.

However, in the instance of “UN1219, Isopropanol *or* Isopropyl alcohol, 3, PG II,” the PSN alternatives are variations of the chemical name that describes the material itself.

In such a case, it would be permissible to show the PSN as one of the alternatives with the other as a chemical or technical group name in parentheses either between the proper shipping name and hazard class or following the basic description—see § 172.202(d)—as such a scenario still accurately describes the material. For example:

- UN1219, Isopropanol (Isopropyl alcohol), 3, PG II
- UN1219, Isopropyl alcohol (Isopropanol), 3, PG II

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".

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

Request for Formal Letter of Interpretation

22-0040

Date: May 3, 2022

Mr. Shane Kelley  
Director, Standards and Rulemaking Division  
U.S. DOT/PHMSA (PHH-10)  
1200 New Jersey Avenue SE, East Building, 2<sup>nd</sup> Floor  
Washington, DC 20590

Dear Mr. Kelley,

I am requesting clarification and a formal interpretation on 49 CFR 172.101(c)(2). The rule states:

The word “or” in italics indicates that there is a choice of terms in the sequence that may alternately be used as the proper shipping name or as part of the proper shipping name, as appropriate. For example, for the hazardous materials description “Carbon dioxide, solid *or* Dry ice” either “Carbon dioxide, solid” or “Dry ice” may be used as the proper shipping name; and for the hazardous materials description “Articles, pressurized pneumatic *or* hydraulic,” either “Articles, pressurized pneumatic” or “Articles, pressurized hydraulic” may be used as the proper shipping name.

Does the use of *or* in this rule prohibit the use of both proper shipping names together for one material? For instance, the proper shipping name for UN 1219 is Isopropanol *or* Isopropyl alcohol. Is it appropriate for this material to be listed as any of the following?

UN 1219, Isopropanol (Isopropyl alcohol), 3, PG II, ERG: 129

UN 1219, Isopropyl alcohol (Isopropanol), 3, PG II, ERG: 129

Must a shipper use only one or the other proper shipping name, or can both names be used as shown?

Thank you for your attention and I look forward to your response.

Joe Strelow  
Operations Manager  
Rinchem Company, Inc  
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