



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

400 Seventh Street, S.W.
Washington, D.C. 20590

DEC 1 2005

Ms. Nancy Aird
Totem Ocean Trailer Express, Inc.
P. O. Box 4129
Federal Way, WA 98063-4129

Reference No.: 05-0255

Dear Ms. Aird:

This responds to your letter concerning the use of certain abbreviations in the shipping paper description of a hazardous material under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180).

Your questions are paraphrased and answered as follows:

Q1. Are the only allowed definitions and abbreviations found in § 171.8?

A1. The answer is no. In addition to § 171.8, definitions and abbreviations are found throughout the HMR. For example, abbreviations that may be used in a shipping paper description are found in Subpart B of Part 172 of the HMR.

Q2. May the following commonly recognized words and abbreviations be used to describe the type of packing on a shipping paper or dangerous cargo manifest for vessel transportation? Barrel – bbl, can – cn, case – cs, carton –ctn, package – pkg, pail or tote.

A2. Neither the HMR nor the IMDG Code specify terminology or criteria to describe the type or kind of packaging; hence, the terms are acceptable. Section 172.202 (a)(5) of the HMR authorizes abbreviations to indicate the type of packaging. Dangerous goods being transported by vessel must be prepared in accordance with the International Maritime Dangerous Goods (IMDG) Code. The IMDG Code is silent on the use of abbreviations to identify packaging type; however, the 5.4.1.5.1 regulatory text reads “The number and kind (e.g., drum, box, etc.) shall also be indicated.” In the case of international shipments it may be prudent to avoid abbreviations that may be unfamiliar to non-English speaking persons.



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171.8
172.202(a)(5)

Q3. Section 171.8 does not define the term “barrel.” May “barrel” be used to describe a packaging type?

A3. Yes. See A2. Also, the term “wooden barrel” is defined in § 171.8 of the HMR.

I trust this satisfies your request.

Sincerely,

A handwritten signature in cursive script that reads "Hattie L. Mitchell". The signature is written in black ink and is positioned below the word "Sincerely,".

Hattie L. Mitchell
Chief, Regulatory Review and Reinvention
Office of Hazardous Materials Standards



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October 03, 2005

Corbin
§ 172.201(a)(3)
§ 172.202(a)(6)
§ 176.30(a)(4)
Shipping Papers
05-0255

Mr. Edward T. Mazzullo
Director, Office of Hazardous Materials Standards
U.S. DOT/PHMSA (PHH-10)
400 7th Street S.W.
Washington, D.C. 20590-0001

SUBJECT: LETTER OF INTERPRETATION

Totem Ocean Trailer Express (TOTE) is a domestic maritime trailership shipping company out of Tacoma, WA and Anchorage, AK. TOTE is desirous of clarification on the correct abbreviations allowed for package types as prescribed by the following CFR 49 sections:

CFR 49 SEC 172.201(a)(3)

CFR 49 SEC 172.202(a)(6)

CFR 49 SEC 176.30 (a)(4)

TOTE has been instructed through our hazardous recertification training that only Definitions and Abbreviations found in CFR 49 SEC 171.8 are allowed on shipping papers and vessel dangerous cargo manifests. TOTE is using HM 215 G.

TOTE receives Roll-On/Roll-Off trailer and container shipments from shippers and consolidators using various modes of transportation nation and world wide. They use various common words and abbreviations not found in the CFR 49 SEC 171.8., for example: BARREL (BBL), CAN (CN), CASE (CS), CARTON (CTN), PACKAGE (PKG), PAIL, and AND TOTE.

CFR 49 SEC 172.201(a)(3) states, "Unless it is specifically authorized or required in this subchapter, the required shipping description may not contain any code or abbreviation." At the same time CFR 49 SEC 172.202(a)(6) indicates, "Abbreviations may be used for indicating packaging types ... provided the abbreviations are commonly accepted and recognizable. Additionally, CFR 49 SEC 176.30 (a) (4) reads "The number and description of packages (barrels, drums, cylinders, boxes, etc) and gross



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weight for each type of packaging." Please note that "BARRELS" is not included in the definitions outlined in CFR 49 171.8." www.totem-ocean.com

TOTE requests clarification on the following questions for ocean transportation.

1) Are the only allowed definitions and abbreviations found in CFR 49 SEC 171.8?

2) Are the below named (common and recognizable) words and abbreviations allowable on hazardous shipping papers and dangerous cargo manifests? For example, shippers and consolidations use barrel (bbl), can (cn), case (cs), carton (ctn), package (pkg), pail and tote.

3) Is Barrels (BBL) an allowed word and abbreviation? Barrels is not allowed by CFR 49 171.8, but is referenced as an example in CFR 49 SEC176.30 (a)(4). It is TOTE s interpretation that Barrels may be used.

TOTE will use your official LETTER OF INTERPRETATION on these issues to educate and inform all of its shippers.

Thank you for your review and response to our questions.

Sincerely,

Nancy Aird
TOTE DOC/HAZARDOUS

Cc. Matt Devenere - TOTE
John Armstrong – TOTE
Paul Den – TOTE
Bill King - TOTE