



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, D.C. 20590

JUL 24 2014

Mr. Tracey G. Smith  
Manager, Regulatory Compliance  
PCS Sales (USA), Inc.  
110 Skokie Boulevard, Suite 400  
Northbrook, IL 60062

Ref No.: 14-0107

Dear Mr. Smith:

This responds to your May 27, 2014 email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) with regard to the basic shipping description on shipping papers when there is no packing group shown in the §172.101 Hazardous Materials Table (HMT). Specifically you ask, if there is a packing group assigned to UN2426, Ammonium nitrate, liquid, and if there is not, how the basic description on the shipping paper should read.

There is no packing group associated with UN2426, Ammonium nitrate, liquid. The only authorized packaging in the HMR for Ammonium nitrate, liquid, is set forth in §173.243, which prescribes bulk packaging for certain high hazard liquids and dual hazard materials that pose a moderate hazard. Section 172.202(a)(4) requires that the packing group in Roman numerals, as designated for the hazardous material in Column (5) of the §172.101 HMT, must be entered on the shipping paper, but states that entries that are not assigned a packing group are excepted from this requirement. Therefore, the basic shipping description for Ammonium nitrate, liquid would be "UN2426, Ammonium nitrate, liquid, 5.1."

I hope this information is helpful. If you have any more questions, please do not hesitate to contact this office.

Sincerely,

Robert Benedict  
Chief, Standards Development  
Standards and Rulemaking Division

**Drakeford, Carolyn (PHMSA)**

O'Donnell  
§ 172.101  
Applicability  
14-0107

**From:** INFOCNTR (PHMSA)  
**Sent:** Wednesday, May 28, 2014 3:27 PM  
**To:** Drakeford, Carolyn (PHMSA)  
**Subject:** FW: Packing Group Assignment for UN2426 - Formal Interpretation Requested

Hi Carolyn,

This caller requested we submit this e-mail as a formal letter of interpretation.

Thanks,

Victoria

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**From:** [TGSmith@potashcorp.com](mailto:TGSmith@potashcorp.com) [mailto:[TGSmith@potashcorp.com](mailto:TGSmith@potashcorp.com)]  
**Sent:** Tuesday, May 27, 2014 12:51 PM  
**To:** PHMSA HM InfoCenter  
**Subject:** Packing Group Assignment for UN2426 - Formal Interpretation Requested

I have been asked by a number of my customers why UN2426 "Ammonium Nitrate, Liquid" (*hot concentrated solution*) is not assigned a packing group since it is classified in the HMT as a 5.1 oxidizer. Is there a packing group for this commodity or if it is blank in the column 5 we just leave it blank on a shipping description?

Mr. Tracey G. Smith  
PCS Sales (USA), Inc.  
Manager, Regulatory Compliance  
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