U.S. Department
of Transportation

Pipeline and Hazardous
Materials Safety
Administration

1200 New Jersey Avenue SE
Washington, DC 20590

JUN 1 0 2015

Ms. Erin N. Jarman
Environmental Scientist
AECOM
1600 Perimeter Park Dr.
Morrisville, NC 27560

Reference No. 15-0095

Dear Ms. Jarman:

This is in response to your May 5, 2015 letter requesting clarification of the Hazardous
Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to use of punctuation on a
shipping paper. Specifically, you ask what types of punctuation may be used to separate
the various components of the basic description on a shipping paper.

A shipping description for a hazardous material should be entered on the shipping paper in
accordance with the general entry provisions of § 172.201 and the basic description
provisions of § 172.202. Section 172.201(a)(2) specifically requires that all shipping
descriptions be legible and printed in English. Section 172.202(b) specifies that the basic
description must also appear in sequence with no additional information interspersed.
Punctuation used within the basic shipping description to separate the components of the
description is not prohibited, but should not reduce legibility. Therefore, it is acceptable to
use punctuation such as slashes, double slashes, spaces, commas, colons, semicolons, or
columns to separate the different parts of the hazardous material basic description.

I hope this satisfies your request.

Sincerely,

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

AECOM

May 5, 2015

Mr. Charles Betts, Director
Office of Hazardous Material Standards
Pipeline and Hazardous Materials Safety Administration
U.S. Department of Transportation
1200 New Jersey Ave, SE
East Building, 2nd Floor
Washington, DC 20590-0001

Dear Mr. Betts:

I am writing to you for clarification concerning the appropriate punctuation to use when separating the various elements of the basic description on shipping papers.

In 49 CFR 172.202(b), an example of the basic description provided shows the use of commas to separate the various elements of the basic description as follows:

"UN2744, Cyclobutylchloroformate, 6.1, (8, 3), PGII"

Is it permissible to use other types of punctuation in place of the commas? For example, would colons or semicolons be acceptable as long as the basic description contains all of the required elements and is in the proper sequence? If so, would the use of these alternate punctuation methods be permissible for all modes of transportation?

Thank you in advance for your assistance in clarifying this question.

Sincerely,

Erin N. Jarman
Environmental Scientist
AECOM

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erin.jarman@aecom.com

From:	Geller, Shelby CTR (PHMSA)
Sent:	Thursday, May 07, 2015 4:17 PM
To:	Hazmat Interps
Subject:	FW: Request for Formal Interpretation
Attachments:	Punctuation Permitted on Shipping Papers.pdf

Dear Shante and Alice,

Attached is a request for a formal letter of interpretation.

Thanks,
Shelby

From: Jarman, Erin [mailto:erin.jarman@aecom.com]
Sent: Thursday, May 07, 2015 2:48 PM
To: INFOCNTR (PHMSA)
Subject: Request for Formal Interpretation

Dear Info Center,

I have attached a request for formal interpretation related to punctuation used on shipping papers. If you have any questions, please feel free to contact me via e-mail or at the telephone number below. Have a great day!

Erin N. Jarman
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