



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

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

**SEP 16 2010**

Mr. John Thompson  
Gilmore Environmental Consulting, LLC  
4 Vermont Square  
Edgewater Park, NJ 08010-3123

Reference No. 10-0081

Dear Mr. Thompson:

This is in response to your e-mail requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) regarding the use of punctuation marks. Specifically, you ask whether a hyphen is required between the words "Poison" or "Toxic" and the word "Inhalation" when the words "Poison Inhalation Hazard" or "Toxic Inhalation Hazard" are required by § 172.203(m) to be entered on the shipping paper following the basic description.

The answer is no. The words can be entered with or without the hyphens. Also, for your information, § 172.101(c)(2) cited in your e-mail is specific to proper shipping names as entered in Column (2) of the § 172.101 Hazardous Materials Table and specifies that punctuation marks are not part of the proper shipping name and may be used, but are not required. The words "Poison Inhalation Hazard" or "Toxic Inhalation Hazard" as specified in § 172.203(m) are not part of the proper shipping name, but are required information that follows the basic description.

I hope this information is helpful. Please contact this office should you have additional questions.

Sincerely,

A handwritten signature in black ink, appearing to read "T. Glenn Foster".

T. Glenn Foster, Chief  
Regulatory Review and Reinvention  
Office of Hazardous Materials Standards

**Drakeford, Carolyn (PHMSA)**

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**From:** INFOCNTR (PHMSA)  
**Sent:** Thursday, April 08, 2010 10:59 AM  
**To:** Drakeford, Carolyn (PHMSA)  
**Subject:** Letter of Interp Request

*McIntyre*  
*§172.101*  
*§172.203 (m)*  
*Shipping Name on Shipping*  
*Papers*  
*10-0081*

-----Original Message-----

**From:** PHMSA-Feedback [mailto:PHMSA-Feedback]  
**Sent:** Thursday, April 08, 2010 10:26 AM  
**To:** PHMSA HM InfoCenter; PHMSA Webmaster  
**Subject:** Hazmat Information Center Feedback: Other Questions?

in 172.101 (c)(2) it states Punctuation marks and words in italics are not part of the proper shipping name, but may be used. In 172.203 (m) it states the words "Poison-Inhalation Hazard or "Toxic-Inhalation Hazard" and the words Zone A, B, C, or D shall be entered on the shipping paper immediately following the shipping description.

I have a client that has an outside company provide a computered generated bill of lading. It does not have a hyphen between Poison or Toxic Inhalation and they have a customer that states there MUST be one there, Who is correct? Could I please get something in writing to show what is the correct way? Thank you.

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