



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

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

MAY 11 2010

Mr. David L. Turnage  
Commercial Chemical  
1707 Townhurst  
Houston, TX 77043

Ref. No. 10-0084

Dear Mr. Turnage:

This responds to your April 16, 2010 request for clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask when must the letters "RQ" be included on a shipping paper.

In your letter, you state that you are getting conflicting guidance for showing the letters "RQ" on your shipping paper for the following chemicals:

Hypochlorite solution, 8, UN 1791, PG II  
Trichloroisocyanuric acid-dry, 5.1, UN 2468,

You further state that, for the above materials, you do not include the letters "RQ" on the shipping paper because the materials are not listed in the Appendix A to §172.101. The letters "RQ" must be included on the shipping paper if the material is listed in the Appendix A of 172.101, and is packaged in a quantity, in one package which equals or exceeds the reportable quantity listed in the Appendix. Therefore, for the materials listed above, the letters "RQ" are not required to be included on the shipping paper because your materials are not listed in the Appendix A to §172.101.

I hope this answers your inquiry. If you need additional assistance, please contact this Office.

Sincerely,

Charles E. Betts  
Chief, Standards Development  
Office of Hazardous Materials Standards

Boothe  
8172.203

**Drakeford, Carolyn (PHMSA)**

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Shipping Papers  
10-0084

**From:** INFOCNTR (PHMSA)  
**Sent:** Friday, April 16, 2010 8:28 AM  
**To:** Drakeford, Carolyn (PHMSA)  
**Cc:** wilson, leandrew (PHMSA)  
**Subject:** FW: Feedback: General Questions/Comments Regarding the PHMSA Enforcement Program

Carolyn,  
See below. This man is requesting a formal written letter of interpretation.  
Thanks,  
Rob

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

**From:** PHMSA-Feedback [mailto:PHMSA-Feedback]  
**Sent:** Thursday, April 15, 2010 4:14 PM  
**To:** HM-Enforcement (PHMSA); PHMSA Webmaster  
**Subject:** Feedback: General Questions/Comments Regarding the PHMSA Enforcement Program

In need of written clarification please of the following; We keep running into a conflict with showing or not showing "RQ" on our bill of ladings for two of our chemicals. This is how we list these two:

1. HYPOCHLORITE SOLUTION, 8, UN1791, PG II
2. TRICHLOROISOCYANURIC ACID-DRY, 5.1, UN2468, PG II

We do not show RQ for these items because these proper shipping names are not listed in the RQ section of the CFR. We made these changes last year at the insistance of a local DOT enforcement officer but now we are getting hassel because we are not showing RQ. Please clarify by return email, letter or fax. Thanks

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