

SFP 14 2011

Mr. Matt Krynski  
Director, Dangerous Goods and Security  
Hapag-Lloyd (America) Inc.  
399 Hoes Lane  
Piscataway, NJ 08854

Ref. No.: 11-0179

Dear Mr. Krynski:

This responds to your August 2, 2011 letter seeking clarification of the shipping paper requirements of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if § 172.202 allows “hazard class 3” to be listed in the description for combustible liquids on shipping papers. You provide the following example: “NA 1993, Combustible liquid, n.o.s. (technical name), 3, PG III.”

The answer to your question is no. Instead of a numerical hazard class, “Combustible liquid” is the hazard class. This is demonstrated in the listing for “Combustible liquids, n.o.s.” in the Hazardous Materials Table, Column 3 that shows the applicable Hazard class or Division as “Comb liq.” Further, § 172.101(d)(4) requires that each reference to a Class 3 material is modified to read ‘Combustible liquid’ when that material is reclassified in accordance with §173.150(e) or (f) of this subchapter or has a flash point above 60 °C (140 °F) but below 93 °C (200 °F).

I hope this answers your inquiry. If you need additional assistance, please contact the Standards and Rulemaking Division at (202) 366-8553.

Sincerely,

Ben Supko  
Acting Chief, Standards Development  
Standards and Rulemaking Division

CONCURRENCES	
RTG. SYMBOL	PHH-11
INITIALS/SIG.	
DATE	LKO
	09-02-11
RTG. SYMBOL	PHH-11
INITIALS/SIG.	DSS
DATE	9/7/11
RTG. SYMBOL	PHH-10
INITIALS/SIG.	JAB
DATE	9/13/11
RTG. SYMBOL	
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U.S. Department of Transportation  
**Pipeline and Hazardous Materials  
Safety Administration**

1200 New Jersey Avenue, SE  
Washington, DC 20590

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Sincerely,

Ben Supko  
Acting Chief, Standards Development  
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Winter  
§172.202  
Shipping Papers  
11-0179



Hapag-Lloyd (America) Inc.  
399 Hoes Lane  
Piscataway, N. J. 08854

August 2, 2011

Mr. Charles E. Betts  
Director, Office of Hazardous Materials Standards  
U.S. DOT/PHMSA (PHH-10)  
1200 New Jersey Avenue, SE East Building, 2nd Floor  
Washington, DC 20590

Dear Mr. Betts,

This letter is to request a written confirmation of an issue discussed with Neal at the Hazardous Materials Information Center on July 28 and 29, 2011.

We understand that 49 CFR 172.202 does not prohibit the entry of class 3 as part of a description for Combustible Liquid, N.O.S. as represented in the example below.

NA 1993, COMBUSTIBLE LIQUID, N.O.S. (\*\*\*\*\*), 3, PG III, FL.PT: + XX CEL

Please verify that our interpretation is correct.

Thank you for your assistance in this matter.

Matt Krynski  
Director, Dangerous Goods and Security  
Matthew.Krynski@HLAG.COM  
732-885-3727