



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, DC 20590

July 24, 2023

Mr. Nick Wright  
1220 S. Enterprise  
Olathe, KS 66061

Reference No. 22-0117

Dear Mr. Wright:

This letter is in response to your October 27, 2022, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the description of hazardous materials on shipping papers. In your email, you referenced a previous Letter of Interpretation (LOI) Ref. No. 15-0229R<sup>1</sup> and note that it may relate to your specific question.

In LOI Ref. No. 15-0229R, we stated that "...PHMSA maintains that the term 'cargo tank' most appropriately describes the type of package; however, the term 'cargo tank motor vehicle' or 'CTMV' is acceptable..." and therefore the term "CTMV"—representing "one cargo tank motor vehicle"—is an acceptable description of total quantity, unit of measure, number, and type of package on a shipping paper as specified in § 172.202(a)(5) and (a)(7). As such, you ask whether the term "1 TRUCK LOAD" meets the requirements pertaining to a description of a hazardous material on a shipping paper as specified in § 172.202(a)(5)(iii)(A) and (a)(7) pertaining to the total quantity, unit of measure, number, and type of package.

Section 172.202(a)(5)(iii)(A) of the HMR provides that bulk packagings are excepted from the requirements specified in § 172.202(a)(5), provided some indication of the total quantity is shown on a shipping paper. Although "1 TRUCK LOAD" indicates a general description of the total quantity of the shipment, it is the opinion of this Office that it does not adequately describe the type of package containing the hazardous materials being transported and could result in the frustration of the shipment.

I hope this information is helpful. Please contact us if we can be of further assistance.

Sincerely,

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

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<sup>1</sup> See 15-0229R (Nov. 3, 2016) at: <https://www.phmsa.dot.gov/regulations/title49/interp/15-0229R>

Jacobson

22-0117

**From:** [INFOCNTR \(PHMSA\)](#)  
**To:** [Dodd, Alice \(PHMSA\)](#); [Hazmat Interps](#)  
**Subject:** FW: Request for official PHMSA interpretation  
**Date:** Monday, October 31, 2022 4:33:34 PM

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Hi Alice and team,  
Please see the LOI request below. Thank you.  
-Rachel (HMIC)

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**From:** Nicholas Wright [KHP] <Nicholas.Wright@KS.GOV>  
**Sent:** Thursday, October 27, 2022 5:17 PM  
**To:** INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>  
**Subject:** Request for official PHMSA interpretation

**CAUTION:** This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Greetings,

I am seeking an official PHMSA interpretation on the following question:

Does the verbiage “**1 TRUCK LOAD**” satisfy the shipping paper requirement (*49 CFR 172.202(a)(5)(iii)(A) and 172.202(a)(7)*) for a total quantity, unit of measure, number, and type of package?

I am familiar with PHMSA interpretation #15-0229R, regarding the use of “1 CTMV” to represent “1 cargo tank,” but I would like official clarification as to whether “TRUCK LOAD” is acceptable.

Technical Trooper Nick Wright, K-100  
Kansas Highway Patrol

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