



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, DC 20590

March 26, 2025

Adel G Hanna  
PO Box 271390  
Oklahoma City, OK 73137

Reference No. 24-0101

Dear Ms. Hanna:

This letter is in response to your October 21, 2024, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the shipper's certification shipping paper requirement. Specifically, must the "shipper's certification" section on a shipping paper be left blank if a shipment does not contain a regulated hazardous material?

No. The requirements of § 172.204 "Shipper's Certification" apply to offerors of hazardous materials in transportation, except as described in §§ 172.204(b) and (c). There is no requirement to sign the shipper's certification if the shipment that is offered contains no hazardous materials. Per § 171.1(b)(11), only the certification "that a hazardous material is in proper condition for transportation in conformance with the requirements of the HMR" is a regulated pre-transportation function. If no hazardous materials are present in the shipment, signature of a bill of lading or language matching the shipper's certification found in § 172.204 would not be a pre-transportation function as defined in the HMR and therefore not a violation of the HMR. Please note that including language matching the § 172.204 "Shipper's Certification" in the bill of lading for a non-hazardous shipment could result in frustration of your shipment.

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

Sincerely,

A handwritten signature in blue ink that reads "T. Glenn Foster".

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

**From:** [INFOCNTR \(PHMSA\)](#)  
**To:** [Dodd, Alice \(PHMSA\)](#)  
**Cc:** [Hazmat Interps](#)  
**Subject:** FW: Request for official interpretation 49 CFR 172.204  
**Date:** Monday, October 21, 2024 2:51:29 PM

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Hello Alice,

Please see the below interpretation request. Let us know if you need anything.

Sincerely,  
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**From:** Adel Hanna <ea4adelghanna@gmail.com>  
**Sent:** Monday, October 21, 2024 12:12 PM  
**To:** INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>  
**Subject:** Request for official interpretation 49 CFR 172.204

**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 need official interpretation and official clarification of 49 CFR 172.204. Please refer to the attached image.

Shouldn't the "Shipper Certification" box in a bill of lading be signed ONLY if a shipment contains hazardous materials?

Specifically, if a shipment is NOT hazmat, shouldn't the "Shipper Certification" be left blank and should NOT be signed?

Since the "Shipper Certification" contains specific language intended for hazardous materials, if it is signed, it implies that the shipment contains hazardous materials. That would be misleading.

Many are misinformed and believe it is acceptable to sign the "Shipper Certification" for non-hazmat shipments.

49 CFR 172.204 DOESN'T include specific language indicating that the "Shipper Certification" SHOULDN'T be signed if it ISN'T a hazmat load.

To me, it's simple common sense. However, everyone has their own opinion and some people think it acceptable to sign the "Shipper Certification" for non hazmat shipments.

If you agree that the "Shipper Certification" SHOULDN'T be signed if it is NOT a hazmat shipment, please send me an official interpretation/clarification on a Pipeline and Hazardous Materials Safety Administration letter head. Also please include a person's name, official signature, and contact information.

You may also want to modify and include specific language in 49 CFR 172.204.

Feel free to call me or email me if you need further clarification of my concerns.

Adel G Hanna

Cell - (405) 464-9463

PO Box 271390

Oklahoma City, OK 73137

Email - [EA4AdelGHanna@gmail.com](mailto:EA4AdelGHanna@gmail.com)

Shipper \_\_\_\_\_

Carrier \_\_\_\_\_

Per \_\_\_\_\_

Per \_\_\_\_\_

Date \_\_\_\_\_

| Shipper Certification                                                                                                                                                                                                                            |  | Carrier Pickup Certification                                                                                                                                                                                                                                |  |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| This is to certify that the above-named materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for Transportation according to the applicable regulations of the Department of Transportation. |  | Carrier acknowledges receipt of packages and required placards. Carrier certifies emergency response information was made available and/or carrier has the Department of Transportation emergency response guidebook or equivalent document in the vehicle. |  |
| Per _____ Date _____                                                                                                                                                                                                                             |  | Per _____ Package No's. _____                                                                                                                                                                                                                               |  |
| Date _____                                                                                                                                                                                                                                       |  | Date _____                                                                                                                                                                                                                                                  |  |

| Receiver Certification                                              |  | Carrier Certification           |  |
|---------------------------------------------------------------------|--|---------------------------------|--|
| RECEIVED THE ABOVE DESCRIBED PROPERTY GOOD CONDITION EXCEPTAS NOTED |  | DRIVER: _____                   |  |
| CONSIGNEE: _____ DATE: _____ TIME: _____                            |  | TRAILER NO: _____ UNITNO: _____ |  |
| PLEASE PRINT: _____                                                 |  |                                 |  |