



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

1200 New Jersey Avenue, SE  
Washington, DC 20590

September 12, 2025

Sam Klein  
Chief Information Officer  
Campbell's Express  
P.O. Box 119  
Pitman, NJ 08071

Reference No. 25-0074

Dear Mr. Klein:

This letter is in response to your May 28, 2025 email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the proper display of hazardous material information on a shipping paper. Specifically, you are seeking confirmation of your understanding of how information should be provided on a bill of lading (*i.e.*, shipping paper) containing hazardous material information for “UN3091, Lithium metal batteries contained in equipment *including lithium alloy batteries*, 9” and “UN3481, Lithium ion batteries contained in equipment *including lithium ion polymer batteries*, 9.” You provide a copy of a hazardous materials shipping paper that lists both materials “UN3091” and “UN3481” and ask several questions regarding this document.

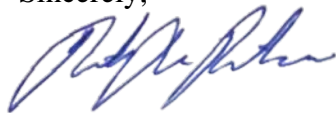
We have paraphrased and answered your questions as follows:

- Q1. A customer is packing “UN3481” and “UN3091” together in the same packaging. The shipping paper, as shown in your incoming letter, represents both UN identification numbers (UN ID) on the same line. Should the UN ID (as well as the proper shipping name (PSN)) of each hazardous material be displayed on separate lines on the shipping paper?
- A1. Yes. The hazardous material shipping description on a shipping paper must show associated information, such as the UN ID and PSN, for each hazardous material on separate lines (*e.g.*, separate table entries). Although this is not explicitly stated in Part 172, Subpart C, each hazardous material has its own entry on a shipping paper to avoid confusion about the information presented for emergency response and enforcement personnel.

- Q2. The shipping paper, as shown in your incoming email, lists the total combined weight of both hazardous materials in the single description. Should the weight for each UN ID (*i.e.*, each hazardous material) be listed separately on the shipping paper?
- A2. Yes. Section 172.202, at paragraphs (a)(5) and (6), instructs a person to include the total quantity of *each* hazardous material listed on the shipping paper.
- Q3. The shipping paper, as shown in your incoming email, includes a column captioned “HM” to identify a hazardous material but no “X” is included next to the hazardous materials description. Should there be an “X” in the “HM” column for the hazardous material?
- A3. No. Section 172.201(a) provides instruction on how to represent a hazardous material on a shipping paper when both hazardous materials and non-hazardous materials are described on the same shipping paper. The options are to enter the hazardous material first, enter the hazardous material information in a contrasting color (or highlighted), or identify the hazardous material entry with an “X” placed in a column captioned “HM.” In the scenario presented in your incoming email, the hazardous material is listed first on the shipping paper, so there is no need to place an “X” in a column captioned “HM.”
- Q4. The shipping paper, as shown in your incoming email, does not specify the package type for the hazardous materials either before or after the hazardous materials description. Instead, the shipping paper contains a column captioned “CartonCnt” indicating the number of packages. Is this sufficient for indicating the number and type of packages as required in § 172.202(a)(7)?
- A4. No. The column captioned “CartonCnt” is not sufficient for indicating the type of packages for each hazardous material shipping description. In accordance with § 172.202(a)(7), the number and type of packages must be indicated in the shipping description for the hazardous material. The type of packages must be indicated by description of the package (for example, “12 drums”). Further, the type of packaging may be entered in any appropriate manner before or after the basic description and abbreviations may be used to express types of packagings.

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

Sincerely,

A handwritten signature in blue ink, appearing to read 'Dirk DerKinderen', is written over a light blue horizontal line.

Dirk DerKinderen  
Chief, Standards Development Branch  
Standards and Rulemaking Division

**From:** [INFOCNTR \(PHMSA\)](#)  
**To:** [Baker, Yul \(PHMSA\)](#)  
**Cc:** [Hazmat Interps](#)  
**Subject:** FW: Letter of Interpretation  
**Date:** Thursday, May 29, 2025 14:39:53  
**Attachments:** [Sample Hazmat BOL.pdf](#)

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Hi Yul,

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

Sincerely,  
Janaye

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**From:** Sam Klein <[sklein@campbellsexpress.com](mailto:sklein@campbellsexpress.com)>  
**Sent:** Wednesday, May 28, 2025 4:43 PM  
**To:** INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>  
**Subject:** Letter of Interpretation

You don't often get email from [sklein@campbellsexpress.com](mailto:sklein@campbellsexpress.com). [Learn why this is important](#)

**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.

Good Afternoon,

I am requesting a letter of interpretation regarding the attached bill of lading documentation.

1. We have a customer who is packing UN3481 Lithion Ion Batteries and UN3091 Lithium Metal Batteries together. They are representing both Hazard ID's on the same line. However, based upon my research and training, I believe each Hazard ID has to be on a separate line. Can you confirm whether they should be listed separately?
2. On the BOL, the total weight is listed for the single, combined line of hazmat, as opposed to individual weights for each of the appropriate Hazard ID's. Can you confirm if the weight should be separated for each Hazard ID?
3. The BOL has a Hazardous Materials column, but there is no checkmark or "x" alongside the Hazardous line item. Shouldn't there be?
4. Lastly, the packaging type for this Hazardous line item isn't listed before or after the Hazardous line item. What is represented is pre-printed on the BOL as "CartonCnt" above the column in which a quantity is input. Does this suffice for the packaging type or should it be listed in closer proximity to the Hazardous description?

Thank you for your assistance. Please feel free to contact me with any questions.

Sincerely,  
Sam Klein  
CIO  
Campbell's Express  
856-589-8300 x210  
[sklein@campbellsexpress.com](mailto:sklein@campbellsexpress.com)