



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

400 Seventh Street, S.W.
Washington, D.C. 20590

JUL 18 2006

Mr. Kevin Kampa
Hazardous Materials Specialist
Minnesota Department
of Transportation
Office of Freight and
Commercial Vehicle Operations
3485 Hadley Ave.
Oakdale, MN 55128

Ref. No. 06-0140

Dear Mr. Kampa:

This responds to your letter dated June 9, 2006, regarding the correct proper shipping name for a hydraulically pressurized article that contains a non-flammable gas under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask whether the proper shipping name for such an article under identification number UN3164 would be: (1) Articles, pressurized hydraulic; (2) Articles, hydraulic; or (3) Hydraulic.

The entry corresponding to the identification number UN3164 in the § 172.101 Hazardous Materials Table (HMT) is "Articles, pressurized pneumatic or hydraulic containing non-flammable gas." One of the terms, pneumatic or hydraulic is intended to be selected, as appropriate, for the material to be described. The intent of combining multiple proper shipping names under one entry in the HMT is to keep the table as short as possible without impairing its effectiveness.



060140

172.101

Therefore, the most appropriate proper shipping name for an article in the scenario you describe would be "Articles, pressurized hydraulic."

I trust this satisfies your inquiry. Please contact us if we can be of further assistance.

Sincerely,

A handwritten signature in cursive script that reads "Hattie L. Mitchell". The signature is written in black ink and is positioned below the word "Sincerely,".

Hattie L. Mitchell
Chief, Regulatory Review and Reinvention
Office of Hazardous Materials Standards



Minnesota Department of Transportation

Office of Freight and Commercial Vehicle Operations
3485 Hadley Ave N
Oakdale, MN 55128

Phone: 651/747-2228
Fax: 651/747-2207

June 9, 2006

Ed Mazzullo- Director of Hazardous Materials Standards
US DOT-PHMSA DHM-10
400 7th Street SW
Washington, DC 20590

Stevens
§ 172.101
Proper Shipping Name
06-0140

Dear Mr. Mazzullo:

I am inquiring about the proper shipping name that should be used for shipping UN3164. The table lists the following: **Articles, Pressured Pneumatic or Hydraulic** (containing non-flammable gas). The question is, what is the proper shipping name when shipping the **Hydraulic** version of this product? It appears it could be one of the following:

Articles, Pressured Hydraulic; or
Articles, Hydraulic; or just simply
Hydraulic

This shipping description appears unique on the table because there is no separate entry for pneumatic or hydraulic like there is with other shipping names with "qualifiers." (for example; Environmentally hazardous substance liquid, nos or solid, nos, have their own separate entries).

Your assistance would be greatly appreciated.

Sincerely,

Kevin Kampa- Hazardous Materials Specialist, Mn/DOT -- OFCVO