



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

1200 New Jersey Avenue, SE
Washington, DC 20590

June 27, 2025

Justin Valanos
Excel Drayage, LLC
15501 Texaco Ave
Paramount, CA 90723

Reference No. 24-0068

Dear Mr. Valanos:

This letter is in response to your July 23, 2024 email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the hazardous materials (hazmat) endorsement on a commercial driver's license (CDL) and other transportation requirements. You describe a scenario in which your company transports shipping containers that each have one to three electric or hybrid vehicles from ports to customer locations and back to the ports. Your understanding is that these vehicles are classed as Class 9 hazmat. You ask several questions regarding the transportation of these containerized vehicles.

We have paraphrased and answered your questions as follows:

- Q1. Are my company hazmat drivers required to have a hazmat endorsement on their CDL, or any specialized training in order to deliver the containers to and from the port?
- A1. The endorsement requirements for a commercial driver's license (CDL) (See 49 CFR Part 383) are under the purview of the Federal Motor Carrier Safety Administration (FMCSA). FMCSA is the lead Federal government agency responsible for regulating and providing safety oversight of commercial motor vehicles. You may wish to contact FMCSA should you require clarification of any requirements relevant to CDLs. Regarding any required specialized training, this depends on how the vehicles are classified by the shipper, how they are offered to your company as the carrier, and whether exceptions to the HMR apply. For example, vehicles classified and described as "UN3171, Battery-powered vehicle" are subject to packaging and transportation requirements of § 173.220. When transported by motor vehicle, shipments made under § 173.220 are generally not subject to any requirements of the HMR other than those in that section. Otherwise, hazmat employees such as drivers and persons who load and unload transport vehicles are subject to training requirements. Please review information

on training requirements at <https://www.phmsa.dot.gov/training/hazmat/training-requirements-industry>.

Q2. Are the shipping containers required to display placards?

A2. No. In accordance with § 172.504(f)(9), a Class 9 placard is not required for domestic transportation of Class 9 materials, including the portion of international transportation that occurs in the United States. Furthermore, as stated in answer A1, motor vehicle shipments of vehicles that meet the packaging and transportation requirements of § 173.220 are generally not subject to any other requirements of the HMR, including placarding, when transported by motor vehicle. Therefore, if properly classified and described by the shipper and transported in accordance with § 173.220, the shipping containers would also not be required to display placards under this section.

Q3. Must the hazmat driver carry any documentation such as a shipping paper or emergency response information while moving these containers?

A3. See answers A1 and A2.

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 Der Kinderen', is positioned above the printed name.

Dirk Der Kinderen
Chief, Standards Development Branch
Standards and Rulemaking Division

From: [INFOCNTR \(PHMSA\)](#)
To: [Dodd, Alice \(PHMSA\)](#)
Cc: [Hazmat Interps](#)
Subject: FW: Intemperate Request - Class 9 Hazard / Non-Bulk
Date: Monday, August 5, 2024 10:28:43 AM

Hi Alice,

Please see the below interpretation request.

Let me know if you have any questions on anything.

Regards,

-Breanna

From: Justin Valanos <admin@exceldrayage.com>
Sent: Tuesday, July 23, 2024 4:43 PM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Subject: Intemperate Request - Class 9 Hazard / Non-Bulk

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U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
PHMSA Hazardous Materials Information Center
1200 New Jersey Avenue, SE
Washington, DC 20590

Dear PHMSA:

I represent a company that does drayage trucking in the Long Beach/San Pedro ports. We pick up shipping containers from the ports and deliver them to our customers and then return said containers back to the port. We handle both import and export container loads.

One of our main customers does internation automobile shipping, so the containers each have 1-3 automobiles in them when going on or off the vessel.

My question is now that we are running into more and more "electric and hybrid" cars - I know they are classified as a class 9 non-bulk hazard.

1. Are my drivers required to have a Hazmat endorsement on their CLD, or any specialized training in order to deliver the containers to and from the port?
2. Are the containers required have placards?
3. Is there any documentation the driver will need while moving these containers?

Thank you,

Justin Valanos

Excel Drayage LLC

562-204-6685

714-371-3936(Cell)

USDOT#3973399

MC#1485491

CA#620239

