



Commercial Vehicle Safety Alliance

Improving commercial motor vehicle safety and enforcement

September 2, 2025

Docket Management System
U.S. Department of Transportation
1200 New Jersey Avenue, SE
West Building, Ground Floor
Room W12-140
Washington, DC 20590

RE: Docket Number: PHMSA-2025-0093
Hazardous Materials: Remove Redundant List of U.S. EPA CERCLA Hazardous Substances

Dear Acting Administrator Kochman,

The Commercial Vehicle Safety Alliance (CVSA) respectfully submits the following comments in response to the Pipeline and Hazardous Materials Safety Administration's (PHMSA) notice of proposed rulemaking (NPRM) seeking stakeholder feedback on the agency's proposal to revise the Hazardous Materials Regulations (HMR) to remove redundant pages contained in an appendix that repeats references listed in U.S. Environmental Protection Agency (EPA) regulations, Docket Number PHMSA-2025-0093.

CVSA is a nonprofit organization comprised of local, state, provincial, territorial and federal commercial motor vehicle safety officials and industry representatives. The Alliance aims to prevent commercial motor vehicle crashes, injuries and fatalities and believes that collaboration between government and industry improves road safety and saves lives. Our mission is to improve commercial motor vehicle safety and enforcement by providing guidance, education and advocacy for enforcement and industry across North America.

PHMSA is proposing to remove Appendix A (Hazardous Substance List) from 49 CFR § 172.101, in an effort to eliminate redundancy and unnecessary requirements in the HMR. PHMSA notes that the list is maintained by the EPA and published in 40 CFR § 302.4. CVSA's members oppose this change. Nowhere is the safe, secure and uniform transportation of goods more important than when the cargo qualifies as a hazardous material. Hazardous materials present unique challenges to enforcement personnel and emergency responders. Effective preparedness and mitigation are fundamental to the reduction of exposure to the population and response forces. It is imperative that commercial motor vehicle inspectors who conduct hazardous materials inspections have reliable, ready access to the information they need to understand the unique characteristics and associated risks of the materials they are inspecting. Inspectors rely on the information in Appendix A to perform their inspections. Removing the list from the HMR would require inspectors to access and navigate a second set of

federal regulation, which they are not familiar with. In addition to the added complexity, this would bring with it additional financial burden for both enforcement and industry, who will have to purchase and manage an additional resource. CVSA's industry and enforcement members strongly encourage PHMSA to leave the Hazardous Substance List in Appendix A, to ensure enforcement and industry have access to the information they need to interact safely with hazardous materials.

CVSA works to closely monitor, evaluate and identify potentially unsafe transportation processes and procedures as well as to help facilitate and implement best practices for enhancing safety on our highways. Commercial motor vehicle safety continues to be a challenge and we need the involvement of all affected parties to help us better understand these issues and put into place practical solutions. We appreciate the agency's commitment to safety and stakeholder involvement.

If you have further questions or comments, please do not hesitate to contact me at 202-998-1008 or collin.mooney@cvsa.org.

Respectfully,

A handwritten signature in black ink, appearing to read 'Collin B. Mooney'.

Collin B. Mooney, MPA, CAE
Executive Director
Commercial Vehicle Safety Alliance