



U.S. Department
of Transportation
**Research and
Special Programs
Administration**

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

OCT 15 2001

Ms. Elaine Palazzo
Regulatory Compliance Specialist
Occidental Chemical Company
5005 LBJ Freeway
Dallas, TX 75244-6119

Ref. No. 01-0246

Dear Ms. Palazzo:

This is in response to your letter dated September 24, 2001, requesting clarification on the placement of the total quantity on a shipping paper. Specifically, you ask whether additional information may be placed between the basic description required by § 172.202(a)(1), (2), (3), and (4) and the total quantity required by § 172.202(a)(5).

The answer is yes. Section 172.201(a)(4) states that the shipping paper may contain additional information concerning the material provided the information is not inconsistent with the shipping description. Additional information concerning the material must be placed after the basic description (§ 172.201(a)(4)). When the total quantity appears after the basic description, additional information may be placed before or after the total quantity.

I hope this satisfies your request.

Sincerely,

Delmer F. Billings
Chief, Standards Development
Office of Hazardous Materials Standards



010246

OxyChem®

Director, Edward T. Mazzullo
U.S. Department of Transportation
Research and Special Programs Administration
Office of Hazardous Materials Standards
DHM-10
400 7th St., S W
Washington, DC 20590-0001

BATT
September 20, 2001
§ 172.202
Shipping Papers
01-0246

Re: **Total Quantity and Additional Information of Shipping Papers**
[172.201(a)(4)], [172.202(c)]

Is the total quantity as it is entered below in violation of 49 CFR 172.201(a)(4) and/or 172.202(c).

State officials have indicated to us that it is in violation of 172.202(c) because additional information not required or authorized by 172 Subpart C can placed between the total quantity and other shipping description information that is required.

SHIPPING WEIGHTS		GROSS	TARE	NET	TEST	SHIPPING NAME	CLASSIFICATION OR CONTAINER
LB		2,486.00	163.00	2,203.00			
KG		1,073.20	73.94	999.26			

ITEM	H/M	PACKAGE NO. & DESCRIPTION	SHIPPING DESCRIPTION
010	X	5 475# Drum	RESIN SOLUTION 3 LITERS PG III

PRODUCT NAME: ~~XXXXXXXXXX~~ THERMOSETTING ~~XXXXXXXXXX~~
RESIN IN SOLVENT
SER GUIDE NO. 127 MSDS# M24
38554-0R

LOT NO: 171101946 2,203.00 lb 999.26 Kg 5 Drum

TOTAL QUANTITY

Sincerely,

Elaine Palazzo

Elaine Palazzo
Regulatory Compliance Specialist
972-404-2424
Fax 972-404-3492

Occidental Chemical Corporation

5005 LBJ Freeway, Dallas, TX 75244-6119
Transportation Regulatory Compliance