



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

1200 New Jersey Ave., S.E.  
Washington, DC 20590

JUL 9 2008

Mr. Robert Mitchell  
Roeder Cartage Company, Inc.  
1979 North Dixie Highway  
Lima, Ohio 45801

Ref. No.: 08-0106

Dear Mr. Mitchell:

This responds to your letter dated April 8, 2008, concerning requirements in the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to special permits. Specifically, you ask if a special permit number (e.g., SP12930) that is marked on a cargo tank must also be entered on a shipping paper.

The answer is yes. Unless otherwise specified in the special permit or except as provided in §173.23, each shipping paper issued in connection with a shipment made under a special permit must bear the notation "DOT-SP" followed by the special permit number assigned and located so that the notation is clearly associated with the description to which the special permit applies (See §172.203(a)).

I hope this satisfies your inquiry. If we can be of further assistance, please contact us.

Sincerely,

John A. Gale  
Chief, Standards Development  
Office of Hazardous Materials Standards

Liquid & Dry Transporters Since 1974

# RCC

Engrum  
§172.203(9)  
Shipping Papers  
08-0106

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## ROEDER CARTAGE COMPANY, INC.

1979 North Dixie Highway  
Lima, Ohio 45801  
(419) 221-1600 • 800-421-8202

10 Legion Drive  
Paris, Kentucky 40361  
(859) 987-2754 • 800-446-3091

April 8, 2008

From : Robert Mitchell  
Director of Safety  
Roeder Cartage Company, Inc.  
Lima, Ohio

To: Helen L. Engrum  
Research and Special Programs Administrator

Subject: California Department of Vehicle Inspection Violation

Ms. Engrum,

Our Roeder Cartage driver James McFarland received a D.O.T. inspection on 4/01/2008. The violation was CFR 49 172.203 (9). It stated the trailer tank markings were not on the shipping papers. I could not find this in the ruling. We want to comply and will amend this to the customer shipping papers in the future if we are required to.

I have enclosed copies of the vehicle inspection report and the shipping papers for clarification purposes. I would greatly appreciate your help in advising Roeder Cartage in this matter.

I can be contacted at: Phone: 419-221-1600  
Fax: 419-221-0056  
E-mail [rmitchell@roedercartage.com](mailto:rmitchell@roedercartage.com)

Roeder Cartage Company, Inc.  
1979 North Dixie Hwy.  
Lima, Ohio 45801  
% Robert Mitchell

Cordially:  
Robert Mitchell



4683668  
 SPEC. PROJ. CODE

DATE 4-1-08 TIME START 12:00AM LEVEL 3 LOC CODE 250 BEAT 881 INSPECTED BY LEADRICK ID NUMBER 17344 TIME END 12:45

**DRIVER INFORMATION**  
 FIRST NAME JAMER MI LAST NAME McFARLAND DDL NO. M96-837-374 BIRTH DATE 5-30-1951 STATE

**CARRIER INFORMATION**  
 CHP NO. CA- PUC NO. ICC NO. MC-  
 CARRIER NAME ROEDER CARTAGE CO. INC DOT NO. US DOT - 188304  
 STREET ADDRESS 179 N. DIXIE HWY CITY LIMA STATE OH ZIP CODE 45801

VEHICLE INFORMATION							DRIVER QUALIFICATIONS				
VEH	YEAR	MAKE	TYPE	AXLES	LIC. NO.	STATE	EQPMT. NO.	COMPLIANCE	NO	O/S	DIS
1	01	FRAT	75	3	PVE5467	OH		Driver's License	OK		
2	00	BREN	28	2	TLW7789	OH		Medical Cert.			
3								Driver's Log			
4								Driver's Hours			

VEHICLE INSPECTION				DISPOSITION CODES				BRAKE ADJUST.		HAZARDOUS MATERIALS INSPECTION							
COMPLIANCE		VEHICLE 1		1 - Repaired at Scene 2 - Towed / Escorted				Front		COMPLIANCE		NO		O/S		DIS	
	E	F	G	H	J	K	L	M	N	O	P	Q	R	S	T	U	V
Steering Components	E																
Exhaust	F																
Warning Devices	G																
Low Air Warning Device	H																
Air Loss: Unapplied	J																
Air Loss: Applied	K																
Brake Adjustment	L																
Brake Drums / Shoes	M																
Other Brake Parts	N																
Fuel System	O																
Lights: Stop / Turn	P																
Connection Devices	Q																
Wheels	R																
Tires	S																
Frame	T																
Suspension	U																
Maintenance / Other	V																
Registration																	
CVSA STICKERS ISSUED	V-1	V-2	V-3	V-4													
NO. 215s ISSUED	CHP 215 NO.	OFFICER ID NO.	REGULATED VEHICLE	REVIEWED BY	ID NO.												
NO. 281s ISSUED	CHP 281 NO.	OWNER'S RESPONSIBILITY	RESPONSIBLE PERSON														

COMMENTS  
 1 TANK 40,000 LB HYDROFLUORIC ACID  
 1 - TANK MARKED WITH DOT SP12930 BUT IT IS NOT ON SHIPPING PAPERS AS REQUIRED BY 172.203(a) CFR 49

PLEASE READ THE INSTRUCTIONS ON THE REVERSE SIDE OF THE FORM. I have acknowledged that I have reviewed and received a copy of this report. DRIVER'S SIGNATURE

**STRAIGHT BILL OF LADING - SHORT FORM-ORIGINAL- Not Negotiable**  
RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of the Bill of Lading.

DELIVERY NUMBER  
**80106217**

AT **501 Nichols Road, Pittsburg, CA, 94565** FROM **General Chemica**  
The property described below, in apparent good order, except as noted (contents and conditions of contents of packages unknown), marked, consigned, and destined as indicated below, which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier to the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth(1) in Official, Southern, Western and Illinois Freight Classifications in effect on the date hereof, if this is a rail or a rail-water shipment, or (2) in the applicable motor carrier classification of tariff if this is a motor carrier shipment.  
Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

Subject to Section 7 of conditions of applicable bill of lading, if this shipment to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement.  
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

CONSIGNEE TO: **MALLINCKRODT BAKER, INC.**  
**2002014** **7001 BY PASS RD.**  
**US 68**  
**PARIS, KENTUCKY**  
**PARIS, KY 40361**  
**UNITED STATES OF AMERICA**

GENERAL CHEMICAL PERFORMANCE PRODUCTS LLC

(Signature of Consignor)

COLLECT

IN CASE OF DELAYED DELIVERY CALL CUSTOMER SERVICE AT (800) 631-8060

F.O.B. POINT : **ORIGIN** CARRIER: **Buyer** ROUTE: **Buyer's Truck Package (Plant**  
CUSTOMERS ORDER NO: **14507-012** RELEASE NO: SALES ORDER NO: **71826**

LOCATION	DELIVERY DATE	DEL TIME FROM	DEL TIME TO	SHIP DATE	VEHICLE / CAR NO.	TM	RT	CS
0002	04 01 2008 MO DY YR	00 00 00 HH MM SS	00 00 00 HH MM SS	04 01 2008 MO DY YR		08	BYRPA1	8

LINE	NUMBER	UNIT	HM	DESCRIPTION OF ARTICLE, SPECIAL MARKS AND EXCEPTIONS	GROSS WEIGHT (Subject to corr.) LB KG	NET WEIGHT LB KG
10	1	CARGO TANK  40,000 LB	X	UN1790, Hydrofluoric acid (with not more than 60 percent strength), 8(6.1), PGII, RQ HF C10 Bulk, CUST TR 1949753000C0		

CONTACT: RUSSANNA TAYLOR @ 859-987-9327  
\*\* ATTENTION CARRIER: SPECIAL INSTRUCTIONS \*\*\*  
=> TRUCK FOR REAR UNLOAD, 20' HOSE - TEFLON LINED  
=> AIR FITTINGS FOR PRESSURE UNLOAD  
=> FITTING SHOULD END IN CHICAGO COUPLING  
=> AIR LINE SHOULD HAVE FILTER & REGULATOR  
=> HOSE:1 END COMPATIBLE W/TRUCK OUTLET, THE OTHER END 2" WITH 4 BOLT FLANGE.  
\*\*\*\*\*  
\*\* CoFA TO BE INCLUDED WITH SHIPMENT \*\*  
\*\*\*\*\*  
*[Signature]*

MAIL PREPAID FREIGHT BILL TO:  
GENERAL CHEMICAL PERFORMANCE PRODUCTS LLC  
C/O DDI  
P.O. BOX 818019  
CLEVELAND, OH 44181

FOR HELP IN CHEMICAL EMERGENCIES INVOLVING SPILLS, LEAKS, FIRE, OR EXPOSURE, CALL TOLL FREE NUMBER 800-424-9300, DAY OR NIGHT  
INTERNATIONAL CALL (703) 527-3887

The description and weight indicated on this bill of lading are correct subject to verification by the appropriate weighting and inspection Bureau according to agreement.

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation, according to the applicable regulations of the Department of Transportation. Shipper's imprint in lieu of stamp; not a part of bill of lading approved by the Interstate Commerce Commission.

\*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight." NOTE:Where the rate is dependent on values, the released value of the property is hereby stated by the Shipper to be not exceeding 100 cents per pound for each distribution package or any higher value permitted by R.R.O MC-972, or 160 cents per pound per article, whichever value results in the lowest transportation charges on date of shipment.

GENERAL CHEMICAL Shipper, per *[Signature]* Agent  
Permanent post office address of shipper: *[Signature]*