



U.S. Department
of Transportation

Pipeline and Hazardous
Materials Safety
Administration

1200 New Jersey Avenue, SE
Washington, D.C. 20590

NOV 16 2009

Ms. Sherri Snyder
Valero Hartford Terminal
201 E. Hawthorne
Hartford, IL 62048

Ref. No. 09-0246

Dear Ms. Snyder:

This is in response to your electronic transmission requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) as amended in a recent rulemaking, "Revision of Requirements for Emergency Response Telephone Numbers," (HM-206F, Docket No. 2006-26322) published in the *Federal Register* on October 19, 2009 (74 FR 53413). You submitted a shipping paper and ask whether it meets the emergency response information (ERI) telephone requirement as amended in the HM-206F final rule. You state that Valero is the registrant of the ERI provider.

The HM-206F final rule requires the name of the person (offeror) that is registered with the emergency response information (ERI) telephone number provider, or its contract number or unique identifier, to be included on a shipping paper in association with (immediately before, after, above or below) the ERI telephone number, unless the name is prominently noted elsewhere on the shipping paper (see § 172.604(b)(1)). The shipping paper that you submitted meets the HM-206F final rule requirement because the name of registrant (Valero) with the ERI telephone number provider is displayed in association with (before, in this case) the ERI telephone number.

I hope this information is helpful. Please contact this office should you have additional questions.

Sincerely,

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

McIntyre
§ 172.200 Subpart C
Shipping Papers

Drakeford, Carolyn (PHMSA)

From: McIntyre, Joan (PHMSA)
Sent: Wednesday, October 28, 2009 2:24 PM
To: Drakeford, Carolyn <PHMSA>
Cc: Mitchell, Hattie <PHMSA>; Foster, Glenn <PHMSA>; Dodd, Alice <PHMSA>
Subject: Can you switch letter?
Attachments: Shipping Papers Update.pdf; Delaware City BOL_001.pdf; Page#1 DelCity BOL001.pdf

09-0246

From: Snyder, Sherri [mailto:Sherri.Snyder@valero.com]
Sent: Wednesday, October 28, 2009 11:20 AM
To: McIntyre, Joan (PHMSA)
Subject: Question

Joan,

In response to the new requirement on shipping papers which is referenced above in the PDF file, we want to ensure our BOL's are meeting compliance. I am attaching a copy of one of our current BOL's for you to please review and respond if it meets all the criteria. In reading the rule it focuses on telephone numbers for the ERI and a telephone number for the offeror, I believe our BOL's contain all this information.

Thanks for you help,

Sherri Snyder
Valero Hartford Terminal
618-255-5104 (phone)
618-254-6064 (fax)

10/28/2009