



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

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

MAR -4 2011

Mr. Roy H. Swartz  
Manager of Regulatory Compliance  
Clean Venture, Inc.  
138 Leland Street  
Framingham, MA 01702

Ref. No.: 10-0256

Dear Mr. Swartz:

This responds to your November 19, 2010 letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). You have provided an example of a hazardous waste manifest. Column 9B of the manifest contains the following proper shipping description "RQ, Waste Trichloroethylene, 6.1, UN1710, PGIII." Column 10 includes the number and type of packages "6 DM/DF," where DM stands for metal drum and DF stands for fiber drum. In column 14, additional information is provided "Line 4 - 4DM, 2DF". Specifically, you ask if two types of packages (e.g., DM/DF) entered in association with a single basic description for a hazardous material would satisfy the shipping paper requirement to list the number and type of packages as part of the shipping description.

The answer is yes. The HMR require the number and type of packages to be entered as part of the shipping description on a shipping paper (§ 172.202(a)(7)). The abbreviations DM and DF are used on hazardous waste manifests to indicate the presence of metal and fiber drums. Thus, the example you provided, which lists the number and type of packages in column 10 of a hazardous waste manifest as "6 DM/DF" for the shipping description satisfies the HMR requirement in § 172.202(a)(7).

In addition, you asked about compliance with the Compliance, Safety, Accountability (CSA) 2010 program. The Federal Motor Carrier Safety Administration implements the CSA 2010 program. Information on CSA 2010 is available at the following website: <http://csa.fmcsa.dot.gov/>.

I trust this satisfies your inquiry. Please contact us if we can be of further assistance.

Sincerely,

Ben Supko  
Acting Chief, Standards Development Branch  
Standards and Rulemaking Division

November 19, 2010

Mr. Edward T. Mazzullo  
Director, Office of Hazardous Materials Standards  
U.S. DOT/PHMSA (PHH-10)  
1200 New Jersey Avenue, SE East Building, 2nd Floor  
Washington, DC 20590

Re: Hazardous Waste Manifest Question – CSA 2010

Dear Mr. Mazzullo

On behalf of Clean Venture, Inc. (US DOT 200827), I would like to ask you what DOT's current position is relative to container type entries on the Uniform Hazardous Waste Manifest (box 10). Specifically, may two types of containers be referenced on a single line?

The situation which commonly occurs in our business involves a generator having several drums of the same type of material, but using both metal and fiber drums (DM and DF). We have been putting "DM/DF" in box 10 (and noting in box 14 how many of each) in order to save time and manifest forms (when only one line remains on a manifest). This practice was deemed acceptable by our state environmental agency (MassDEP) and by the US DOT Hotline a couple of years ago. With the advent of the new CSA rules, we are requesting assurance that this practice would not be considered a violation in the cargo related category of the CSA 2010 system.

Sincerely,



Roy H. Swartz  
Manager of Regulatory Compliance

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