



U.S. Department
of Transportation

1200 New Jersey Avenue SE
Washington, DC 20590

**Pipeline and Hazardous
Materials Safety
Administration**

JUN 22 2011

Mr. Larry Steigerwald
EnviroServe
5502 Schaaf Road
Cleveland, OH 44131

Reference No. 11-0071

Dear Mr. Steigerwald:

This is in response to your e-mail requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to shipping paper requirements. Specifically, you ask for clarification of § 172.201(a)(4) and whether the HMR allows an emergency response guidebook (ERG) number and an Environmental Protection Agency (EPA) waste stream number specific to the material to be added to shipping papers following the proper shipping description.

Section 172.201(a)(4) allows for a shipping paper to contain additional information concerning the material being transported provided the information is not inconsistent with the required description. In addition, unless otherwise permitted or required by the HMR, additional information must be placed after the basic description required by §172.202(a) of the HMR. Therefore, additional information may be entered on the shipping paper under these conditions.

Please note that § 172.203(c)(1) provides that for a hazardous waste, the waste code (e.g., D001), if appropriate, may be used to identify the hazardous substance. If the EPA waste code identifies a hazardous substance, it must be in parentheses in association with the basic description. For example, UN3077, Environmentally hazardous substance, solid, n.o.s., (D008, asbestos), 9, PG III may be used. With respect to the ERG number, although it is not required on the shipping paper, if a carrier uses the ERG to fulfill the emergency response information requirements, the proper shipping name and the UN identification number are acceptable to cross reference the correct entry in the ERG.

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

Sincerely,

T. Glenn Foster
Chief, Regulatory Review and Reinvention
Standards and Rulemaking Division

Drakeford, Carolyn (PHMSA)

From: INFOCNTR (PHMSA)
Sent: Thursday, March 24, 2011 3:15 PM
To: Drakeford, Carolyn (PHMSA)
Subject: Interp Request Larry Steigerwald

M. McIntyre
§ 172.201
Shipping Papers
11-0071

Hi Carolyn,

We received the following request for a letter of interpretation at the Info Center. The caller previously spoke with Victoria Lehman in the Info Center and was referred to interp letter 08-0280 .

Thanks,
Victoria

Victoria Lehman
Hazmat Information Center (HMIC)
Pipeline & Hazardous Materials Safety Administration 1200 New Jersey Avenue, SE,
E21-119 Washington, D.C. 20590
<http://phmsa.dot.gov/hazmat/info-center>
(202) 366-1035

-----Original Message-----

From: PHMSA-Feedback [mailto:PHMSA-Feedback]
Sent: Thursday, March 24, 2011 6:46 AM
To: PHMSA HM InfoCenter; PHMSA Webmaster
Subject: Hazmat Information Center Feedback: Hazardous Materials Table, Special Provisions, Hazardous Materials Communications

I wish to obtain clarification in regards to proper shipping descriptions, more specifically, preparation and retention of shipping papers, 172.201(a)(4).

172.201 (a)(4) states:

A shipping paper may contain additional information concerning the material provided the information is not inconsistent with the required description. Unless otherwise permitted or required by this subpart, additional information must be placed after the basic description required by Sec. 172.202(a).

It is my interpretation of 172.201(a)(4) that it is permissible to add a emergency response guide number and waste stream number, specific to the material, following the proper shipping description.

Can you please provide clarification of my interpretation of 172.201(a)(4)?

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