



U.S. Department
of Transportation

Pipeline and Hazardous
Materials Safety
Administration

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

JAN 07 2016

Mr. J. David Shaeffer
COWAN
1910 Halethorps Farms Rd.
Baltimore, MD 21227

Ref. No. 15-0222

Dear Mr. Shaeffer:

This is a response to your October 30, 2015 letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) regarding shipping paper requirements. It is your understanding only the initial U.S. carrier is required to maintain a shipping paper with the shipper's certification.

With respect to highway transport of hazardous material, your understanding is correct. In accordance with § 177.817(b), the shipper is required to provide the initial highway carrier with a shipping paper that includes a signed shipper's certification. Any subsequent highway carrier that transports the same hazardous material shipment is not required to be provided with or maintain the shipper's certification; however, secondary carriers must maintain a shipping paper that otherwise conforms to Part 172, Subpart C.

Your further questions are paraphrased and answered as followed:

Q1. What information is required on shipping papers accompanying a highway carrier shipment transferred from a rail or water carrier?

A1. Shipping papers for hazardous material transportation must be prepared in accordance with 49 CFR Part 172, Subpart C, and contain all information relevant to the hazardous material being shipped (See, for example, § 172.202).

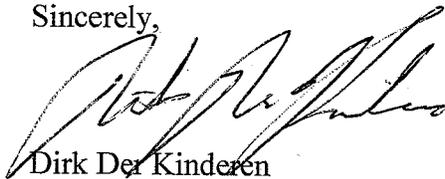
Q2. Is the proper shipping name and emergency response number required on shipping papers?

A2. Yes (see A1). Unless excepted by the HMR, proper shipping name(s) and an emergency response number are required on shipping papers. The proper shipping name as prescribed for the material as shown in Column (2) of the § 172.101 table is just one of many informational requirements for description of hazardous material under § 172.202.

Furthermore, except under certain conditions, a shipping paper must contain an emergency response telephone number, and if utilizing an emergency response information telephone number service provider, must identify the person (by name or contract number) who has a contractual agreement with the service provider in accordance with § 172.201(d).

I hope this answers your inquiry. If you need additional assistance, please contact this Office again.

Sincerely,

A handwritten signature in black ink, appearing to read "Dirk Der Kinderen". The signature is fluid and cursive, with a large initial "D" and "K".

Dirk Der Kinderen
Chief, Standards Development Branch
Standards and Rulemaking Division

Mitchell
\$ 172,200
Shipping Papers
15-0222



1910 Halethorpe Farms Road Baltimore, Maryland 21227

October 30, 2015

U.S DOT
PHMSA Office of Hazardous Materials Standards
Attn: PHH-10
East Building
1200 New Jersey Avenue, SE.
Washington, DC 20590-0001

Dear Sirs:

I understand that only the initial US. Carrier is required to maintain a shipping paper with a Shipper's Certification. My question is when a highway carrier picks up a hazmat load from a rail or ocean carrier, what information is required on the paperwork accompanying the shipment?

Must the Proper Shipping Name and a 24 hr. emergency response number both be on the paperwork? Can you provide me with an interpretation on subsequent carrier paperwork requirements.

Yours truly,

A handwritten signature in cursive script that reads "J. David Shaeffer".

J. David Shaeffer
Hazardous Materials Compliance
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dshaeffer@cowansystems.com