

Hazardous Materials Bulletin

SHIPPING PAPERS

December 2007

Questions regarding shipping papers are very common. This bulletin is provided as a general guide to what is required on a hazardous material shipping paper. This is only a guide, and Title 49, Part 172; Subpart C should be reviewed prior to completing a shipping paper for transportation.

Shipping papers for hazardous materials are required for almost all hazardous materials, regardless of quantity, with very few exceptions (some are: ORM-Ds, wet batteries under §173.159, nurse tanks under §173.315(m), and non-bulk packages of combustible liquids under §173.150). Hazardous materials shipping papers are required regardless of whether you are a private operation or a for hire motor carrier.

What to include

All shipping papers must have four elements, referred to as a basic shipping description (all of these elements, for each material, are listed in the table in Section §172.101):

- Proper Shipping Name
- Hazard Class or Division, including any applicable subsidiary hazard class or division, in parenthesis, immediately following the primary class or division.
- UN (or NA) Identification Number
- Packing Group (NOTE: There are no packing groups for gases, radioactives, ORM-Ds, some explosives, self-reactive materials and organic peroxides)

Additionally, shipping papers must contain the following:

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| • Total Quantity Transported (some exceptions) | • Emergency Telephone Number (See below) |
| • Shipper Certification (some exceptions) | • Emergency Response Information (See below) |
| • Total number and type of packages | • |

Other requirements may include special notations as applicable such as:

- Limited Quantities (LTD. QTY.)
- Subsidiary hazard class/division entered in parenthesis following the primary class/division
- Special Permits (DOT-SP0000)
- Hazardous Substances (RQ or EPA D000)
- Radioactive Materials (see Section §172.203(d))
- Anhydrous Ammonia ("0.2 PERCENT WATER" or "NOT FOR Q AND T TANKS")
- Liquefied Petroleum Gas ("NONCORROSIVE," "NONCOR," OR "NOT FOR Q AND T TANKS")
- Marine Pollutants ("Marine Pollutant")
- Poisonous Materials ("Poison," "Poison-Inhalation Hazard" and "Zone A/B/C/D")
- Elevated Temperature Materials ("HOT")
- Technical Names for N.O.S. Materials and other generic descriptions (See Section §172.203(k)).

- Hazardous Wastes (EPA Manifest, see Section §172.205). The word “WASTE” must precede the shipping name, for hazardous wastes.

How to enter information

There is no specific form that must be used; however, there is a specific format the information must be in:

- The basic shipping description MUST be entered in the order shown above, with no additional information interspersed, except that §172.202 (b) allows for the identification number to be listed first, followed by the proper shipping name, hazard class or division, and packing group.
- When hazardous materials and non-hazardous materials are on the same shipping paper, the hazardous materials entries must be entered in one of the following manners:
 1. entered first;
 2. highlighted in a different color; or
 3. with a “X” or “RQ” (if appropriate) in a hazardous materials column.
- While in transit (see Section §177.817), the hazardous materials shipping paper must be distinguished from other shipping papers by tabbing or placing it on top. Further, the shipping paper must be within the driver’s reach when wearing a seatbelt, and must be “readily visible” to a person entering the vehicle. Should the driver leave the vehicle, it must be on the driver’s seat or must be in a holder on the driver’s door.

Emergency Response Information

This requirement is found in §172.600, and is designed to provide first responders with initial actions that can be taken to mitigate any incident that may occur. An Emergency Response Guidebook does qualify for this provision; however, first responders already have these and an extra copy will not provide them with any new information. Material Safety Data Sheets (MSDS) may qualify, but not all MSDS contain the required information. Shippers are permitted to create their own document provided it contains all the required information.

In addition to the basic shipping description, the following information is required:

- Fire/Explosion Hazards
- Initial Spill/Leak Handling Methods
- Immediate Precautions to Take During an Incident
- Preliminary First Aid Measures

Additionally, §172.606 requires carriers to instruct drivers to contact the carrier in the event of a hazardous materials incident; and further requires the emergency response information and the carriers telephone number to be available to responders when a trailer is left without motive power.

Emergency Response Telephone Numbers

Found in §172.604, an Emergency Response Telephone Number is required of anyone who “offers” a hazardous material for transportation. This generally means it is the shipper’s telephone number, although they may contract with a third party to take the responsibility.

A person knowledgeable of the material and who has “comprehensive emergency response and incident mitigation information” must monitor this number at all times that a hazardous material is in the transportation system. Callbacks, pagers, answering machines, etc., are illegal.

The number must be entered on the shipping paper immediately following the hazardous materials description or it may be entered once on the paper in a clearly visible location with an indication that it is for emergencies (i.e., EMERGENCY CONTACT:”).

§172.604(c) states that the telephone number is not required for: Limited quantities; Engines, internal combustion; Battery powered equipment; Battery powered vehicle; Wheelchair, electric; Carbon dioxide, solid; Dry ice; Fish meal, stabilized; Fish scrap, stabilized; Castor bean; Castor meal; Castor flake; Castor pomace; or Refrigerating machine.

Retention of Shipping Papers

§177.817 (f) mandates the retention of shipping papers (in paper or electronic form) at or through the principle place of business, after the material is accepted by the initial carrier for a period of:

Hazardous Waste: 3 years
All Others 2 years

Retained shipping papers must be made available upon request, to an authorized Federal, State, or Local government agency, at reasonable times and locations.

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Michigan State Police – Traffic Safety Division, www.michigan.gov/motorcarrier

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