



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

400 Seventh Street, S.W.
Washington, D.C. 20590

MAR - 7 2000

Mr. Jerry W. Freeman
Hazardous Materials Coordinator
RPS, Inc.
P.O. Box 108
Pittsburgh, PA 15230

Ref. No. 00-0001

Dear Mr. Freeman:

This is in response to your letter dated December 21, 1999, and subsequent telephone conversation with a member of my staff regarding shipping paper requirements under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Your questions are paraphrased and answered as follows:

- Q1. May a carrier electronically generate a shipping paper at his facility for the purpose of consolidating multiple shipments offered by different shippers?
- A1. The answer is yes. Part 172, Subpart C does not specify a particular form in which a shipping paper must appear. However, regardless of the form, the shipping paper must contain all the applicable information as required under Part 172, Subpart C and meet the requirements in § 177.817.
- Q2. Must the carrier modify the shipping paper upon making intermediate hazardous material shipment drop-offs?
- A2. The answer is no. A driver is not required to update a shipping paper to reflect a partial delivery. However, if a driver picks up additional quantities of hazardous



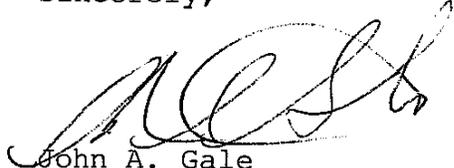
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materials which were not previously indicated on the shipping paper, the additional quantities must be added if the total quantity on the vehicle at any time exceeds that indicated on the shipping papers.

I hope this satisfies your request.

Sincerely,

A handwritten signature in cursive script, appearing to read "John A. Gale". The signature is written in dark ink and is positioned above the typed name.

John A. Gale
Transportation Regulations Specialist
Office of Hazardous Materials Standards

"We consider safety first in our operation"

BAH
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00-0001

RPS, Inc., Safety Department
P.O. Box 108
Pittsburgh, PA 15230
(800) 762-3725

December 21, 1999

Information Center
Office of Hazardous Material Standards
Research & Special Programs Administration
United States Department of Transportation
400 Seventh Street, S.W.,
Washington D.C. 20590-0001

I am writing to you on behalf of RPS, Inc. to get clarification on the Hazardous Material Regulations. My questions pertain to the definition of *shipping papers* and the use of the shipping paper on a package. 49CFR Part 171.8 defines *shipping paper* as a shipping order, bill of lading, manifest or other shipping document serving a similar purpose and containing the information required by §§ 172.202, 172.203 and 172.204. My two questions are:

1. Provided the appropriate emergency response information is present and available, can a computer-generated manifest serve as the shipping paper(s) as required by 49CFR 177.817 that contain multiple entries (shipments) from various shippers?
2. Provided the carrier satisfies all the requirements of highway transportation under 49CFR 177.817, can the shipping paper be in the form of a self-adhesive label without multi-parts and still meet the requirements of 49CFR 172.600?

I appreciate your time and consideration in this matter. Should you have any questions, please do not hesitate to contact me at 412-262-7351.

Respectfully,

Jerry W. Freeman
Hazardous Materials Coordinator

cc: Elizabeth Bracci