



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

NOV 27 2000

Mr. Robert L. Edgar
Rinchem Company, Inc.
Training Center
6149 Edith NE
Albuquerque, NM 87107

Ref. No. 00-0307

Dear Mr. Edgar:

This is in response to your letter of October 26, 2000, and subsequent phone conversations with Michael Johnsen, of my staff, regarding emergency response information required by § 172.602 of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you asked if § 172.602(b)(3) requires that the 2000 Emergency Response Guidebook (ERG) "guide number" that applies to a hazardous material represented on the shipping paper be printed on the shipping paper.

The answer is no. Neither the ERG "guide number" nor the page number needs to be printed on the shipping paper. If a carrier uses the ERG to fulfill the emergency response information requirements, the proper shipping name and UN ID number are acceptable to cross reference the correct entry in the ERG.

I hope this satisfies your request.

Sincerely,

Delmer F. Billings
Chief, Standards Development
Office of Hazardous Materials Standards



00-0307

172.602

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October 26, 2000

Mr. Robert McGuire
Acting Associate Administrator for
Hazardous Materials Safety
US Department of Transportation
Research and Special Programs Admin.
400 Seventeenth Street, S.W.
Washington, DC 20590

RE: Interpretation of DOT Hazardous Materials Regulations Requested

Dear Mr. McGuire:

We are interested in your interpretation of the requirements for compliance with 49 CFR 172.602. When we ship hazardous material, we are required to prepare shipping papers as specified in 49 CFR Subpart C (quantity, container types, number, proper shipping description(s), emergency response phone number, etc.). We insure the immediate response information is with the papers, as specified in 172.602(a), by carrying the most recently published DOT Emergency Response Guidebook (ERG).

Does 172.602(b)(3) require that the ERG Guide number that applies to a hazardous material being transported must be written on the shipping paper (such as after each proper shipping description) in order to be in compliance? Do the cross references of the Proper Shipping Name and DOT ID Number on the papers and in the ERG satisfy the 172.602(b)(3)(iii) requirement, and, therefore, the ERG Guide Number does not have to be listed? If MSDSs are used to supply the immediate response information specified in these regulations what additional information has to be listed on the shipping papers to comply with 172.602 other than a cross reference such as the Proper Shipping Name or DOT ID Number?

Please call if you have any questions. I look forward to your reply so that we can ensure that all of our shipping papers are in complete compliance with DOT regulations.

We Care,



Robert L. Edgar
E, S&H Manager

WRITER
§ 172.602
Emergency Response
Shipping Papers
00-0307