



U.S. Department
of Transportation
**Research and
Special Programs
Administration**

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

JUL 10 2002

Ms. Joan Van Matre
US Liquids of Georgia Solvent Division
1184 Logan Circle
Atlanta, GA 30318

Ref. No.: 02-0084

Dear Ms. Van Matre:

This responds to your March 18, 2002 letter requesting clarification on shipping paper documentation and placarding under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask the correct shipping description and proper placard required for your non-bulk and bulk shipments of combustible plate wash solvent.

According to your letter, you ship a plate wash solvent that you have classed as a "Combustible liquid" in 55-gallon drums and in 275-gallon totes. The shipping papers attached with your letter are not in compliance with the HMR. The basic shipping description (the proper shipping name, hazard class number, UN identification number, and packing group number) is incorrect. Regarding the sequence of information, the type of packaging, e.g., "drums, (55 gal)" may be entered before or after the basic description. Any additional information concerning the material must be placed after the basic description required by § 172.202(a).

In addition, "plate wash solvent" is not a proper shipping name or proper technical name. Generic shipping paper entries such as "Combustible liquid, n.o.s.", requires a technical name or chemical name of the ingredient that makes the material combustible. A technical name is a recognized chemical name or microbiological name currently used in scientific and technical handbooks, journals, and texts. Generic descriptions are authorized for use as a technical names provided they readily identify the general chemical group, or microbiological group. Examples of acceptable generic chemical descriptions are organic phosphate compounds, petroleum aliphatic hydrocarbons and tertiary amines. Trade names may not be used as technical names.

The following is an example of a proper shipping description for a "Combustible liquid, n.o.s." material:

1 tote, Combustible liquid, n.o.s.(proper technical name), NA 1993, 400 lbs.

In response to your placarding question, if you meet provisions in § 173.150(f), the non-bulk (55-gallon drum) shipment of the plate wash solvent is not subject to the HMR, including shipping paper, marking, labeling, and placarding, unless it is a hazardous waste, hazardous substance, or marine pollutant.



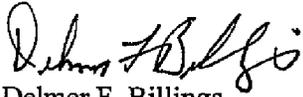
02-0084

172,101

However, the bulk (tote) shipment of the plate wash solvent is subject to the HMR as stated in § 173.150(f) and must be properly described on the shipping paper, marked, packaged, and placarded. Each bulk package must be marked with the UN identification number as specified in §§ 172.302 and 172.322. In accordance with § 172.504(a), each bulk packaging, freight container, unit load device, transport vehicle, or rail car containing any quantity of a hazardous must be placarded on each side and each end with the type of placards specified in tables 1 or 2 of this subpart. In addition, under § 172.514(c), a tote or portable tank having a capacity of less than 3,785 L (1,000 gallons) may be placarded on only two opposite sides or, alternatively, may be labeled instead of placarded. For your information, there is no combustible label authorized in the HMR. A placard on a tote may be used to meet vehicle placarding if it is visible on all four sides; however, if the bulk package is inside a freight container or transport vehicle and the placards are not visible, the motor vehicle must be placarded on all four sides and the UN identification number displayed.

I hope this answers your inquiry.

Sincerely,



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

Boothe
§172.101
§172.544
Proper Shipping Name
Placarding
02-0084

March 18, 2002

Mr. Ed Mazzullo
The Hazardous Materials Information Center

Dear Mr. Mazzullo,

We need your help in clarifying the correct shipping papers and truck placarding for the plate wash solvent that we ship.

I am faxing you the following:

Our standard shipping Bill of Lading (for 1 - 55 gallon drum/275 gallon tote/24 - 55 gallon drums)

The MSDS for two of the solvents that we ship

We need information in writing please for the following:

- For a 275 gallon tote shipment - correct shipping papers and correct truck placard
- For a 55 gallon drum (each drum weighs 400 lbs.) - correct shipping papers and truck placard if any required
- For 20 - 55 gallon drums or more - correct shipping papers and truck placard if any required

Also, we need to know if a common carrier is carrying 20 - 55 gallon drums and the trailer had combustible placarding, and he had the shipping papers completed as we are sending you for plate wash solvent, was he in violation for having the combustible placards on the trailer?

He had a DOT officer pull him over on Friday and he was given a ticket for having the combustible placard on his trailer. The officer said it was not supposed to be placarded at all since it was drums not bulk (tote).

We do put 2 combustible labels on the 275 gallon totes for shipment and we have been giving the freight carrier driver the combustible placards for their trailer. Also we have been giving the drivers the combustible placards for their trailers when we ship more than 2200 lbs in 55 gallon drums but we do not put the combustible labels on the 55 gallon drums.

Please fax your response to my attention at 404-605-0095 and please mail the original to:

Joan VanMatre
US Liquids of Georgia Solvent Division
1184 Logan Circle
Atlanta, Georgia 30318

If you have any questions, please call me at 404-605-0085.
Thank You for your assistance.