



U.S. Department
of Transportation

Research and
Special Programs
Administration

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

AUG 14 1998

Mr. Eugene J. Secor
EHS/Transportation Specialist
H.B. Fuller Automotive Company
31601 Research Park Drive
Madison Heights, Michigan 48071

Ref. No. 98-0224

Dear Mr. Secor:

This responds to your letter concerning shipping paper requirements of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask whether information concerning a shipment may be included on a shipping paper so that it can serve the dual purposes of a bill of lading and a packing list.

The HMR do not specify a particular format for shipping papers. Rather, Subpart C of Part 172 sets forth the information that must be included on shipping papers and the order in which that information must appear. The "mock-up" shipping document that you enclosed with your letter may be used as a shipping paper provided the requirements of Subpart C are met.

In this regard, we note that your "mock-up" does not include hazardous materials shipping descriptions. For shipments of hazardous materials, the required shipping description means the basic description required by § 172.202, and additional description information required by § 172.203. The basic description, consisting of the proper shipping name for the material as identified in § 172.101 of the Hazardous Material Table, the hazard class, the identification number and the packing group, if any, must be shown in sequence with no additional information interspersed. Additional information, such as that required by § 172.203, or other additional information concerning the hazardous material must be placed after the basic description on a shipping paper, except that a technical name or chemical group name for a generic description may follow the proper shipping name. The only information allowed to be placed before the basic description is quantity shipped, and the type of packaging and destination marks (see § 172.201(a)(2)(iii), § 172.201(a)(4) and § 172.202(c)). Thus, you may include packing slip data applicable to a hazardous materials shipment on a shipping paper, but that information must

172.202

be shown after the required shipping description.

As you develop your shipping documents, you should also be aware of requirements for including a shipper's certification on the shipping paper (see § 172.204). In addition, most shipments of hazardous materials must be accompanied by emergency response information, including an emergency response telephone number (see Subpart G of Part 172).

I hope this information is helpful. If you have further questions, please do not hesitate to contact this office.

Sincerely,



Thomas G. Allan
Senior Transportation Regulations Specialist
Office of Hazardous Materials Standards



H.B. Fuller Automotive Company

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Madison Heights, Michigan 48071
(810) 585-2200 • (800) 633-7789
FAX (810) 585-3699

AUGUST 5, 1998

Gorsky
§ 172.202

**US DEPARTMENT OF TRANSPORTATION
RESEARCH AND SPECIAL PROGRAMS ADMINISTRATION
STANDARDS DEVELOPMENT, DHM-11
400 SEVENTH STREET, S.W.
WASHINGTON, DC 20590**

**ATTENTION: MR DELMER F. BILLINGS
CHIEF, REGULATIONS DEVELOPMENT**

Dear Mr. Billings:

In an effort to streamline and consolidate our paper flow, the question has arisen as to what exactly can be put on a shipping paper (Bill of Lading). The impetus behind this effort has to do with the fact that two sets of papers generally accompany a shipment regardless of whether the material is hazardous or not. These papers are the Bill of Lading which goes with the truck driver and a packing list which is usually attached to the container for a specific customer.

The crux of the question is whether a shipping paper can serve these dual purposes; namely, function legally as a shipping paper and as a packing list while also being mindful of 172.201(4). Would inclusion of normal packing slip data on the BL after all shipping entries have been entered be a violation? I have attached a "mock up" of what we propose to do. Assuming our proposal is in compliance, could you comment on a better lay out for the mock-up?

Rest assured that we are not doing this currently; this is simply a query at this point. If there are any questions, feel free to contact me at 810-498-1317.

Sincerely,
HB FULLER COMPANY

EUGENE J SECOR
EHS/TRANSPORTATION SPECIALIST

cc: Sarah Oebser -- Willow Lake B
Cathy Boussie -- Madison Heights
Brian Lim -- Lexington Ave

DATE 6/1/98

PAGE 1 of 2

02000298
GENERAL MOTORS OF CANADA
GENERAL MOTORS OSHAWA
PLANT #2 DOCK QQQ
OSHAWA, ONTARIO L1H 8P7
CANADA

SHP FROM		SHIP TO DEST
PREMIUM TRANSPORTATION AUTHORIZATION		
MODE	METHOD	SCAC

FOB Terms: FOB Shipping Point/Collect

REGULATORY INFORMATION ONLY -- RECEIVING INFORMATION BELOW

PACKAGING NUMBER KIND	H.M.	DESCRIPTION OF ARTICLES SPECIFIC MARKS AND EXCEPTIONS	WEIGHT Subject to Correction
9 BX		NOT A REGULATED MATERIAL, COMPOUNDS VEHICLE BODY SEALER OR SOUND DEADENER, LIQUID OR PASTE, IN BARRELS, BOXES OR PACKAGE 1235, ITEM # 50315, CLASS 55 FS703M30 HOT MELT STICK 1004269007	153
3 MD		NOT A REGULATED MATERIAL, COMPOUNDS VEHICLE BODY SEALER OR SOUND DEADENER, LIQUID OR PASTE, IN BARRELS, BOXES OR PACKAGE 1235, ITEM # 50315, CLASS 55 WC2231 MP UNDERBODY COATING 1100010202	15150
GROSS WEIGHT			15303
NET WEIGHT			15125

RECEIVING INFORMATION BELOW

<u>CUST. PURCHASE ORDER/ CUST. RELEASE</u>	<u>CUST. PART NO./ CUST. SEAL NO. RESOURCE DESCRIPTION</u>	<u>EFTEC ORDER NO. RESOURCE NO. CONTAINER UOM</u>	<u>QUANTITY</u>	<u>CUSTOMER UOM</u>	<u>LOT NUMBER</u>
81HM6 OSR842443	2027505 FS703M30 HOT MELT STICK	52799 1004269007	9 BX	450 TP	
				150	1480556431
				300	1480556444

****CONTINUED****

DATE 6/1/98

PAGE 2 of 2

02000298
GENERAL MOTORS OF CANADA
GENERAL MOTORS OSHAWA
PLANT #2 DOCK QQQ
OSHAWA, ONTARIO L1H 8P7
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DHB01217 OSR842442	9984175 SEAL-0270 WC2231MP UNDERBODY COATING	52800 1100010202	3 MD	15000	LB	
				10000		1480553996
				2000		1480554000
				3000		1480553213

***ASN REQUIRED: SHIP TIME _____

Messages: Ship on Tuesday – Receiving hours at GM are
(8:30 – 12:00 noon) only.
Bar code must have viscosity.

Messages: VIS & BKFLD REQUIRED ON LABEL – CERTS REQ'D.
90 DAY EXPIRATION
GREEN DRUM W/LINER & COVER SHEET

FROM **EFTEC North America, L.L.C.** AT _____ DATE _____ SHIPMENT ID _____

The property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated below, which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in Uniform Freight Classifications in effect on the date hereof, if this is a rail or a rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CONSIGNEE TO	SHIP FROM	SHIP TO DEST	COD CHARACTERS BY
	EQUIPMENT ID		COLLECTED ON DELIVERY <input type="checkbox"/>
	MODE	METHOD	SCAC
			AMT \$ _____
			FEE \$ _____
			TOTAL \$ _____

PACKAGING NUMBER KIND	H.M.	DESCRIPTION OF ARTICLES SPECIFIC MARKS AND EXCEPTIONS	WEIGHT Subject to Correction
			Subject to Section 7 of condition of applicable bill of lading. If this shipment is to delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement. The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.
			EFTEC North America, L.L.C. (Signature of Consignor)
			If charges are to be prepaid, write or stamp here, "To be Prepaid."
			Received \$ _____
			to apply in prepayment of the charges on the property described hereon.
			Agent or Cashier
			Per _____ (The signature here acknowledges only the amount prepaid.)
			Charges Advanced \$ _____

BL format we currently use!!

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.
 NOTE - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
 THE AGREED OR DECLARED VALUE OF THE PROPERTY IS HEREBY SPECIFICALLY STATED BY THE SHIPPER TO BE NOT EXCEEDING 165 CENTS PER POUND FOR EACH DISTRIBUTION PACKAGE.

FOR CHEMICAL EMERGENCY CALL CHEMTREC 1-800-424-9300 DAY OR NIGHT

THIS IS TO CERTIFY THAT THE ABOVE NAMED MATERIALS ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED AND LABELED AND ARE IN PROPER CONDITION FOR TRANSPORTATION, ACCORDING TO THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

The fibre boxes used for this shipment conform to the specifications set forth in the box marker's certificate thereon, and all other requirements of the Consolidated Freight Classification. (Shipper's imprint in lieu of stamp, not a part of bill of lading approved by the Interstate Commerce Commission.)

Permanent post office address of shipper (Shipper) **EFTEC North America, L.L.C.**
 Per _____ Agent, Per _____

EMERGENCY RESPONSE GUIDES (ERG)

ERG 11

POTENTIAL HAZARDS

FIRE OR EXPLOSION - Flammable/combustible material; may be ignited by heat, sparks or flames. May ignite other combustible materials (wood, paper, oil, etc.) Container may explode in heat of fire. Reaction with fuels may be violent. Runoff to sewer may create fire or explosion hazard.

HEALTH HAZARDS - May be fatal if inhaled, swallowed or absorbed through skin. Contact may cause burns to skin and eyes. Fire may produce irritating or poisonous gases. Runoff from fire control or dilution water may cause pollution.

EMERGENCY ACTION

Keep unnecessary people away; isolate hazard area and deny entry. Stay upwind; keep out of low areas. Positive pressure self-contained breathing apparatus (SCBA) and structural firefighters' protective clothing will provide limited protection. CALL Emergency Response Telephone Number on Shipping Papers first. If Shipping Paper not available or no answer, CALL CHEMTREC AT 1-800-424-9300. If water pollution occurs, notify the appropriate authorities.

FIRE - Small Fires: Dry chemical, CO₂, water spray or regular foam. Large Fires: Water spray, fog or regular foam.

Move container from fire area if you can do it without risk. Apply cooling water to sides of containers that are exposed to flames until well after fire is out. Stay away from ends of tanks. For massive fire in cargo area, use unmanned hose holder or monitor nozzles; if this is impossible, withdraw from area and let fire burn.

SPILL OR LEAK - Shut off ignition sources; no flames, smoking or flames in hazard area. Keep combustibles (wood, paper, oil, etc.) away from spilled material. Do not touch or walk through spilled material. Small Spills: Take up with sand or other noncombustible absorbent material and place into containers for later disposal. Large Spills: Dike far ahead of liquid spill for later disposal.

FIRST AID - Move victim to fresh air and call emergency medical care; if not breathing, give artificial respiration; if breathing is difficult, give oxygen. In case of contact with material, immediately flush skin or eyes with running water for at least 15 minutes. Remove and isolate contaminated clothing and shoes at the site. Keep victim quiet and maintain normal body temperature.

ERG 26

POTENTIAL HAZARDS

FIRE OR EXPLOSION - Flammable/combustible material; may be ignited by heat, sparks or flames. Vapors may travel to a source of ignition and flash back. Container may explode in heat of fire. Vapor explosion hazard indoors, outdoors or in sewers. Runoff to sewer may create fire or explosion hazard.

HEALTH HAZARDS - May be poisonous if inhaled, swallowed or absorbed through skin. Vapors may cause dizziness or suffocation. Contact may irritate or burn skin and eyes. Fire may produce irritating or poisonous gases. Runoff from fire control or dilution water may give off poisonous gases and cause water pollution.

EMERGENCY ACTION

Keep unnecessary people away; isolate hazard area and deny entry. Stay upwind; keep out of low areas. Positive pressure self-contained breathing apparatus (SCBA) and structural firefighters' protective clothing will provide limited protection. Isolate for 1/2 mile in all directions if tank, rail car or tank truck is involved in fire. CALL Emergency Response Telephone Number on Shipping Papers first. If Shipping Paper not available or no answer, CALL CHEMTREC AT 1-800-424-9300. If water pollution occurs, notify the appropriate authorities.

FIRE - Small Fires: Dry chemical, CO₂, water spray or alcohol-resistant foam. Do not use dry chemical extinguishers to control fires involving nitromethane or nitroethane. Large Fires: Water spray, fog or alcohol-resistant foam.

Move container from fire area if you can do it without risk. Apply cooling water to sides of containers that are exposed to flames until well after fire is out. Stay away from ends of tanks. For massive fire in cargo area, use unmanned hose holder or monitor nozzles; if this is impossible, withdraw from area and let fire burn. Withdraw immediately in case of rising sound from venting safety device or any discoloration of tank due to fire.

SPILL OR LEAK - Shut off ignition sources; no flames, smoking or flames in hazard area. Stop leak if you can do it without risk. Water spray may reduce vapor, but it may not prevent ignition in closed spaces. Small Spills: Take up with sand or other noncombustible absorbent material and place into containers for later disposal. Large Spills: Dike far ahead of liquid spill for later disposal.

FIRST AID - Move victim to fresh air and call emergency medical care; if not breathing, give artificial respiration; if breathing is difficult, give oxygen. In case of contact with material, immediately flush skin or eyes with running water for at least 15 minutes. Wash skin with soap and water. Remove and isolate contaminated clothing and shoes at the site.

ERG 27

POTENTIAL HAZARDS

FIRE OR EXPLOSION - Flammable/combustible material; may be ignited by heat, sparks or flames. Vapors may travel to a source of ignition and flash back. Container may explode in heat of fire. Vapor explosion hazard indoors, outdoors or in sewers. Runoff to sewer may create fire or explosion hazard. Material may be transported hot.

HEALTH HAZARDS - May be poisonous if inhaled, swallowed or absorbed through skin. Vapors may cause dizziness or suffocation. Contact may irritate or burn skin and eyes. Fire may produce irritating or poisonous gases. Runoff from fire control or dilution water may cause pollution.

EMERGENCY ACTION

Keep unnecessary people away; isolate hazard area and deny entry. Stay upwind; keep out of low areas. Positive pressure self-contained breathing apparatus (SCBA) and structural firefighters' protective clothing will provide limited protection. Isolate for 1/2 mile in all directions if tank, rail car or tank truck is involved in fire. CALL Emergency Response Telephone Number on Shipping Papers first. If Shipping Paper not available or no answer, CALL CHEMTREC AT 1-800-424-9300. If water pollution occurs, notify the appropriate authorities.

FIRE - Small Fires: Dry chemical, CO₂, water spray or regular foam. Large Fires: Water spray, fog or regular foam.

Move container from fire area if you can do it without risk. Apply cooling water to sides of containers that are exposed to flames until well after fire is out. Stay away from ends of tanks. For massive fire in cargo area, use unmanned hose holder or monitor nozzles; if this is impossible, withdraw from area and let fire burn. Withdraw immediately in case of rising sound from venting safety device or any discoloration of tank due to fire.

SPILL OR LEAK - Shut off ignition sources; no flames, smoking or flames in hazard area. Stop leak if you can do it without risk. Water spray may reduce vapor, but it may not prevent ignition in closed spaces. Small Spills: Take up with sand or other noncombustible absorbent material and place into containers for later disposal. Large Spills: Dike far ahead of liquid spill for later disposal.

FIRST AID - Move victim to fresh air and call emergency medical care; if not breathing, give artificial respiration; if breathing is difficult, give oxygen. In case of contact with material, immediately flush eyes with running water for at least 15 minutes. Wash skin with soap and water. Remove and isolate contaminated clothing and shoes at the site.

ERG 31

POTENTIAL HAZARDS

FIRE OR EXPLOSION - Some of these materials may burn, but none of them ignites readily. Material may be transported hot.

HEALTH HAZARDS - Contact may cause burns to skin and eyes. Inhalation of asbestos dust may have a damaging effect on the lungs. Fire may produce irritating or poisonous gases. Runoff from fire control or dilution water may cause pollution.

EMERGENCY ACTION

Keep unnecessary people away; isolate hazard area and deny entry. Positive pressure self-contained breathing apparatus (SCBA) and structural firefighters' protective clothing will provide limited protection. CALL Emergency Response Telephone Number on Shipping Papers first. If Shipping Paper not available or no answer, CALL CHEMTREC AT 1-800-424-9300. If water pollution occurs, notify the appropriate authorities.

FIRE - Small Fires: Dry chemical, CO₂, water spray or regular foam. Large Fires: Water spray, fog or regular foam.

Move container from fire area if you can do it without risk. Do not scatter spilled material with high-pressure water streams. Dike fire control water for later disposal.

SPILL OR LEAK - Stop leak if you can do it without risk. Avoid inhalation of asbestos dust. Small Dry Spills: With clean shovel place material into clean, dry container and cover loosely; move containers from spill area. Large Spills: Dike far ahead of liquid spill for later disposal. Cover powder spill with plastic sheet or tarp to minimize spreading.

FIRST AID - In case of contact with material, immediately flush eyes with running water for at least 15 minutes. Wash skin with soap and water. Remove and isolate contaminated clothing and shoes at the site.

ERG 37

POTENTIAL HAZARDS

FIRE OR EXPLOSION - Flammable/combustible material. May ignite itself if exposed to air. May re-ignite after fire is extinguished. May burn rapidly with flare-burning effect. Runoff to sewer may create fire or explosion hazard.

HEALTH HAZARDS - If inhaled, may be harmful. Contact may cause burns to skin and eyes. Fire may produce irritating or poisonous gases. Runoff from fire control or dilution water may cause pollution.

EMERGENCY ACTION

Keep unnecessary people away; isolate hazard area and deny entry. Stay upwind; keep out of low areas. Positive pressure self-contained breathing apparatus (SCBA) and structural firefighters' protective clothing will provide limited protection.

CALL Emergency Response Telephone Number on Shipping Papers first. If Shipping Paper not available or no answer, CALL CHEMTREC AT 1-800-424-9300. If water pollution occurs, notify and appropriate authorities.

FIRE - Some of these materials may react violently with water. Hydroaulitic Fire: Use flooding quantities of water for any size fire. Small Fires: Dry chemical, soda ash, lime or sand. Large Fires: Flood fire area with water from a distance.

Do not get water inside container. Move container from fire area if you can do it without risk. Apply cooling water to sides of containers that are exposed to flames until well after fire is out. Stay away from ends of tanks. For massive fire in cargo area, use unmanned hose holder or monitor nozzles; if this is impossible, withdraw from area and let fire burn.

SPILL OR LEAK - Do not touch or walk through spilled material; stop leak if you can do it without risk. Do not get water inside container. Small Spills: Flush areas with flooding amounts of water. Large Spills: Dike liquid spill for later disposal.

FIRST AID - Move victim to fresh air and call emergency medical care. In case of contact with material, immediately flush skin or eyes with running water for at least 15 minutes. Remove and isolate contaminated clothing and shoes at the site.

ERG 60

POTENTIAL HAZARDS

HEALTH HAZARDS - Contact causes burns to skin and eyes. If inhaled may be harmful. Fire may produce irritating or poisonous gases. Runoff from fire control or dilution water may cause pollution.

FIRE OR EXPLOSION - Some of these materials may burn; but none of them ignites readily. Flammable/poisonous gases may accumulate in tanks and hopper cars. Some of these materials may ignite combustibles (wood, paper, oil, etc.)

EMERGENCY ACTION

Keep unnecessary people away; isolate hazard area and deny entry. Stay upwind; keep out of low areas. Positive pressure self-contained breathing apparatus (SCBA) and structural firefighters' protective clothing will provide limited protection.

CALL Emergency Response Telephone Number on Shipping Papers first. If Shipping Paper not available or no answer, CALL CHEMTREC AT 1-800-424-9300. If water pollution occurs, notify the appropriate authorities.

FIRE - Some of these materials may react violently with water. Small Fires: Dry chemical, CO₂, water spray or regular foam. Large Fires: Water spray, fog or regular foam.

Move container from fire area if you can do it without risk. Apply cooling water to sides of containers that are exposed to flames until well after fire is out. Stay away from ends of tanks.

SPILL OR LEAK - Do not touch or walk through spilled material; stop leak if you can do it without risk. Small Spills: Take up with sand or other noncombustible absorbent material and place into containers for later disposal. Small Dry Spills: With clean shovel place material into clean, dry container and cover loosely; move containers from spill area. Large Spills: Dike far ahead of liquid spill for later disposal.

FIRST AID - Move victim to fresh air; call emergency medical care. In case of contact with material, immediately flush skin or eyes with running water for at least 15 minutes. Remove and isolate contaminated clothing and shoes at the site. Keep victim quiet and maintain normal body temperature.