



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

JAN 22 2001

Mr. RG Wilson
Vice President
Arrowhead Industrial Services, Inc.
P.O. Box 1000
Graham, North Carolina 27253

Ref. No. 00-0344

Dear Mr. Wilson:

This responds to your December 5, 2000 letter requesting clarification on whether electronic methods of recordkeeping are permitted under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) and Parts 106 and 107. Specifically, you ask whether the generation, acquisition, accumulation, transfer, final certification and presentation, as well as storage of data, information and/or reports, as required under 49 CFR by electronic methods is prohibited.

Unless specifically prohibited in the HMR, electronic methods of submitting reports, paperwork, and recordkeeping is authorized. For example, the HMR requires that a hard copy of the shipping paper/manifest be carried on the transport vehicle when transporting hazardous material; however, electronic retention of a shipping paper/manifest is authorized. Other forms of paperwork, reports, certifications, etc. required under the HMR are permitted to be submitted and maintained electronically.

I hope this answers your inquiry.

Sincerely,

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



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COMPRESSED GAS
CONTAINER SPECIALISTS

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Applicability

ARROWHEAD
INDUSTRIAL SERVICES, INC.

05 December 2000

CA-9804008
IA01

Via Facsimile and Federal Express

Mr. Edward Mazzullo
Director, DHM-10
Research and Special Programs Administration
Office of Hazardous Materials Standards
United States Department of Transportation
400 Seventh Street, SW
Washington, DC 20590
USA

Subject: Application Request for Regulatory Interpretation

Reference: 49 CFR Parts 106, 107 and 171-180

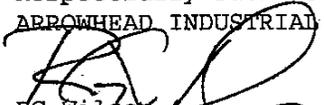
Sir,

ARROWHEAD INDUSTRIAL SERVICES, INC., whose corporate office is located at 3537 South NC 119, PO Box 100, Graham, North Carolina 27253 USA, formally makes application request to your office, for a regulatory interpretation of the above referenced parts of the CODE OF FEDERAL REGULATIONS.

Specifically, are the generation, acquisition, accumulation, transfer, final certification and presentation as well as storage of data, information and/or reports, as required within the above referenced document, by electronic methods prohibited?

In an effort to expedite, a response via facsimile transmission will be appreciated.

Respectfully submitted,
ARROWHEAD INDUSTRIAL SERVICES, INC.


RG Wilson
Vice President

Cc: JP Vassallo
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