



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, D.C. 20590

MAY 16 2008

Mr. Jim Eavenson
Idaho State Police
P.O. Box 700
Meridian, ID 83680-0700

Ref. No. 08-0087

Dear Mr. Eavenson:

This responds to your March 20, 2008 letter requesting clarification of the requirements for shipping papers under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask whether § 172.202(a)(7), which requires an indication of the number and type of packages on a shipping paper, applies to both bulk and non-bulk packagings.

The answer is yes. Section 172.202(a)(7) applies to both non-bulk and bulk packagings.

I hope this information is helpful. Please contact us if you require additional assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "John A. Galé".

John A. Galé,
Chief, Standards Development
Office of Hazardous Materials Standards



Idaho State Police

Service since 1939



Colonel G. Jerry Russell
Director

C.L. "Butch" Otter
Governor

March 20, 2008

Mr. Edward T. Mazzullo
Director, Office of Hazardous Materials Standards
U.S. DOT/PHMSA
1200 new Jersey Avenue, SE East Building, 2nd Floor
Washington, DC 20590

Der Kinderen
§172.202(a)(7)
Shipping Papers
08-0087

Dear Mr. Mazzullo,

Please clarify 49 CFR 172.202(a)(7). Does this section only apply to non-bulk shipments or does it apply to both bulk and non-bulk? The examples listed are non-bulk examples, but there is nothing in the section excluding bulk shipments. The section says:

172.202(a)(7) The number and type of packages must be indicated. The type of packages must be indicated by description of the package (for example, "12 drums"). Indication of the packaging specification number ("1H1") may be included in the description of the package (for example, "12 1H1 drums" or "12 drums (UN 1A1)"). Abbreviations may be used for indicating packaging types (for example, "cyl." for "cylinder") provided the abbreviations are commonly accepted and recognizable.

I have officers who contend this section applies to both bulk and non-bulk shipments. I have a carrier who contends it only applies to non-bulk. I called the HMIC and was told by two different technicians that the section applies to both, but they were unwilling to provide a written answer on this topic.

Please send me a written answer to this question.

Sincerely,

Jim Eavenson

Jim Eavenson
Hazmat Sergeant, Idaho State Police
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