



U.S. Department of Transportation
**Pipeline and Hazardous Materials
Safety Administration**

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

MAY 27 2010

Mr. Herb Giles
Manager, Hazardous Materials
Hyundai America Shipping Agency, Inc.
7701 Las Colinas Ridge, Suite 400
Irving, TX 75063

Ref. No. 10-0076

Dear Mr. Giles:

This responds to your March 31, 2010 letter regarding shipping paper description requirements under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask for clarification of the requirement in § 172.202(b) that the basic description on a shipping paper must be shown in sequence with “no additional information interspersed.”

Your letter includes copies of shipping papers with additional wording interspersed in the basic description. The basic descriptions include category titles for the component parts of the basic description interspersed within the basic description sequence such as “UN Number,” “Proper Shipping Name,” “Packaging Group,” and “Hazard Class.” You ask whether the formats used on the shipping papers comply with § 172.202(b).

The answer is no. Except for provisions that allow for additional information to be included in the basic description sequence, no additional information may be interspersed in the basic description. For example, § 172.202(a)(3)(i) allows the words “Class” or “Division” to precede the hazard class or division number(s) in the basic description sequence and § 172.202(d) allows the technical or chemical group name to be entered in parentheses between the proper shipping name and hazard class in the basic description sequence. Otherwise, no additional information such as category titles may be interspersed in the basic description sequence.

I hope this information is helpful. If you have further questions, please contact this office.

Sincerely,

Charles E. Betts
Chief, Standards Development
Office of Hazardous Materials Standards



Der Kinderen
§172.202
Shipping Papers
10-0076

31 March 2010

Office of Hazardous Materials Standards
Pipeline and Hazardous Materials Safety
Attn: DHM-10, US Department of Transportation
400 7th Street SW
Washington, DC 20590-0001

Hyundai America Shipping Agency
7701 Las Colinas Ridge, Suite 400
Irving, Texas 75063

re: 172.202 - Shipping Description Sequence
IMDG Section 5.4.1.2 - Sequence of Dangerous Goods Description

Att: (1) Hebei Jiheng Chemical Co Ltd Shipping Paper
(2) International Flvors & Fragrances Inc Shipping Paper
(3) Chevron Texaco Shipping Paper

1. Part 172.202 addresses required elements that constitute a shipping description. Furthermore, 172.202(a) states the shipping description MUST contain the elements addressed in 172.202(a)(1) - UN Number; (2) Proper Shipping Name (3) Hazard Class and (4) Packing Group. Part 172.202(b) stipulates a specific sequence with "no additional information interspersed".

2. It is the requirement for "no additional information to be interspersed I am seeking an official interpretation on.

3. Please see the attached Dangerous Goods Forms received from various shippers.

Attachment (1): Please note that Item Number (6) is titled "UN Number", Item Number (7) is titled "Proper Shipping Name", and Item Number (8) is titled "Hazard Class" followed by "Packing Group". Provided for in each of these items is a blank area where the shipper types in the appropriate information constituting the shipping description. Please note that the sequence being used by this shipper complies with both the IMDG Code and 172.202. The problem seems to have arisen concerning the line Titles that allegedly violate the "no additional information interspersed".

Attachment (2): Please note "PROPER SHIPPING NAME", CHEMICAL NAME (IF N.O.S.), "IMDG" and "PKG GROUP" are all interspersed within the shipping description.

 **HYUNDAI AMERICA SHIPPING AGENCY, INC.**

7701 LAS COLINAS RIDGE, SUITE 400, IRVING, TX 75063
TEL: (972) 373-3100 FAX: (972) 373-3139

Attachment (3): Please note this document contains the words "UN NUMBER" vice simply "UN"2468 and "Packaging Group" vice simply "PG".

4. Above are only a few of the examples that I could provide containing varying information in the shipping description.

5. My question is: Do the formats used by these shippers; i.e., titling lines 6,7 and 8 with the "UN Number, Proper Shipping Name, Hazard Class and Packing Group on Attachment (1); the words "PROPER SHIPPING NAME" and "CHEMICAL NAME (IF N.O.S.)" and "IMDG" preceding the word Class and "PKG GROUP" being used vice PG on attachment (2); and the words "UN NUMBER" vice simply "UN" and "Packaging Group" vice simply PG all violate the intent of "no additional information interspersed" or do these documents comply with 172.202?

6. I thank you in advance for your time concerning this matter of utmost importance. If more information is needed, please feel free to call me at the below number

Best Regards,

Herb Giles
Manager, Hazardous Materials
Hyundai America Shipping Agency
972-373-3160

SHIPPER'S DECLARATION FOR DANGEROUS GOODS

***CARGO CANNOT BE ACCEPTED UNTIL A DECLARATION IS FULLY COMPLETED BY THE SHIPPER IN ACCORDANCE WITH THE APPLICE I.M.D.G. CODE/D.O.T REGULATIONS.

1. BOOKING NUMBER HDMUXGWB0304204 VESSEL/VOYAGE HYUNDAI CHALLENGER 014E

2. SHIPPER (CO. NAME & ADDR.) HEBEL JIHENG CHEMICAL CO.,LTD
125 ZHONGHUA STREET HENGSHUI CITY 053000 HEBEL,CHINA

3. AGENT OR BROKER _____

4. CONSIGNEE (CO. NAME & ADDR.) ARCH CHEMICALS,INC.
C/O QUALCO,INC.225 PASSAIC STREET PASSAIC NJ 07055 UNITED STATES

5. 24HR EMCY. # & CONTACT NAME (COMPANY OR INDIVIDUAL) _____ CHEMTREC 1-703-527-3887

6. UN NUMBER 2468

7. PROPER SHIPPING NAME (PRINT ONLY) _____
TRICHLOROISOCYANURIC ACID, DRY

TECHNICAL/ CHEMICAL NAME (IF N.O.S) _____

8. HAZARD CLASS 5.1 PACKING GROUP II

9. SUBSIDIARY CLASS OR DIVISON _____ FLASH POINT (CEL) NO

10. PLACARDED _____

11. MARINE POLLUTANT Yes / No (IF YES, CHEMICAL NAME) NO

12. NUMBER & DESCRIPTION OF PACKAGES 38BAGS

13. GROSS WEIGHT 38152KGS (KG / LBS) CUBIC FT _____

14. EMERGENCY RESPONSE GUIDE NUMBER _____ EMS F-A.S.-0
BSIU2334283/CAIU2132250

15. CONTAINER NUMBER(S) _____

16. POISON INHALATION HAZARD (IF CLASS 2.3) _____ ZONE _____

17. REMARKS _____

I Hereby declare that the contents of this consignment are fully and accurately described above by the Proper Shipping Name and are classified, packaged, marked and labeled/ placarded and are in all respects in the proper condition for transport according to the applicable International and National Government Regulations.

It is declared that the packing of the goods into the container/ vehicle has been carried out in accordance with the applicable provisions.

Name/Title of Signatory: SALES

Signature: Yang Jihong



2010-3-4

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ATTACHMENT (1)