



U.S. Department
of Transportation

1200 New Jersey Avenue SE
Washington, DC 20590

**Pipeline and Hazardous
Materials Safety
Administration**

JUL 18 2012

Mr. Mark Phillip
Hazmat Service, Inc.
1715 Millard St.
Bethlehem, PA 18017

Reference No. 12-0119

Dear Mr. Phillip:

This is in response to your email request for clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the emergency response telephone number requirement for shipping papers as adopted in the HM-206F final rule, "Revision of Requirements for Emergency Response Telephone Numbers," published on October 19, 2009 in the *Federal Register* [74 FR 53413] and effective on October 1, 2010. A correction to that final rule's effective date was published in the *Federal Register* on October 22, 2010 [74 FR 54489] and an editorial revision was published in the *Federal Register* [75 FR 53593] on September 1, 2010 under a final rule, "Hazardous Materials: Minor Editorial Corrections and Clarifications," HM-244C.

In your email, you state it is your understanding that an 800 number, international number, contract number (provided by the emergency response information (ERI) provider), or the name of the 24-hour emergency response registrant is required in the area of the shipping paper where the 800 number is placed. You further state that the name of the 24-hour ERI provider is not needed or should not be placed in this area of the shipping paper.

The HMR requires the name of the registrant of the ERI provider, (or contract number, or other unique identifier as provided by the ERI provider, to identify the registrant), to be noted in association with (immediately before, after, above or below) the ERI provider's emergency response telephone number, only if the registrant is not already noted elsewhere on the shipping paper in a prominent manner. (See § 172.604(b)(1) and (b)(2)) Therefore, provided the registrant's name is already entered elsewhere on the shipping paper (such as the offeror) in this manner, there is no requirement to add the name twice by adding it in association with the emergency response telephone number. In addition, please note that

the emergency response telephone number is not required to be an 800 number. Further, the international access code or the "+" (plus) sign, country code, and city code, as appropriate, must be included, as applicable.

I hope this information is helpful. Please contact this office should you have additional questions.

Sincerely,

A handwritten signature in black ink, appearing to read "T. Glenn Foster". The signature is fluid and cursive, with a long horizontal stroke extending to the left.

T. Glenn Foster
Chief, Regulatory Review and Reinvention Branch
Standards and Rulemaking Division

Mc Intyre
8172.604
Emergency Response Number
12-0119

Drakeford, Carolyn (PHMSA)

From: INFOCNTR (PHMSA)
Sent: Thursday, May 17, 2012 10:54 AM
To: Drakeford, Carolyn (PHMSA)
Subject: FW: Request Letter of Interpretation

Hi Carolyn,

We received the following request for a letter of interpretation.

Thanks,
Victoria

From: Hazmat Service [<mailto:info@hazmat-service.com>]
Sent: Wednesday, May 16, 2012 11:47 PM
To: INFOCNTR (PHMSA)
Subject: Request Letter of Interpretation

Dear DOT Information Center,

I am requesting a letter of interpretation regarding PHMSA Final Rule HM-206F. I have listed a few of the details below:

I am CEO of a 24hr ER Service provider - Hazmat Service, Inc.

At times there is some confusion regarding what is needed on the Dangerous Goods Declaration in the area where the 800# is placed.

Some haz-mat carriers / transporters inform the shipper that along with the 800# they also need the name of the 24hr ER provider. The way I understand the ruling the following items are what is required:

800# or International#

Contract# (provided by 24hr ER provider) or name of the 24hr ER Registrant.

The name of the 24hr ER provider is not needed or should not be placed in this area. This information would not help emergency personal retrieve safety information for the inbound caller

Thank You,

Mark Phillip
Hazmat Service, Inc.
1715 Millard St.
Bethlehem, PA 18017
Tel: 888-932-9994
Fax: 866-596-1239
Email: info@hazmat-service.com