



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

OCT 04 2018

1200 New Jersey Avenue, SE
Washington, DC 20590

Jeff Messer
Safety Analyst
CFI Drive
4701 East 32nd Street
Joplin, MO 64804

Reference No. 18-0097

Dear Mr. Messer:

This letter is in response to your June 29, 2018, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to shipping paper requirements. Specifically, you submitted a copy of a hazardous material shipping paper and asked if the numbering on the pages of the shipping paper met the requirements in § 172.201(c).

The answer is no. A hazardous material shipping paper may consist of more than one page if each page is consecutively numbered and the first page bears a notation specifying the total number of pages included in the shipping paper. The hazardous material shipping paper you submitted consists of four pages, while the only indication of the total number of pages on the first page titled "Bill of Lading," states "Page 1 of 1" and the four pages are not consecutively numbered.

Additionally, please note that the shipper's certification is incorrect. For clarity and consistency, the certification must be reproduced word-for-word from one of the applicable options in § 172.204. Abbreviations—for instance, "DOT" in place of "Department of Transportation"—are not acceptable.

I hope this information is helpful. Please contact us if we can be of further assistance.

Sincerely,

Dirk Der Kinderen
Chief, Standards Development Branch
Standards and Rulemaking Division

Patrick
Shipping Papers
18-0097

January, Ikeya CTR (PHMSA)

From: Foster, Glenn (PHMSA)
Sent: Monday, July 02, 2018 8:08 AM
To: Dodd, Alice (OST); January, Ikeya CTR (PHMSA)
Cc: Foster, Glenn (PHMSA)
Subject: request for interpretation
Attachments: image2018-06-26-201556.pdf

Ikeya and Alice,

Please have the attached checked in as a request for an Interp and assign to a Specialist.

Thanks,
Glenn

From: Alston, Barbara CTR (PHMSA)
Sent: Friday, June 29, 2018 2:59 PM
To: Foster, Glenn (PHMSA) <Glenn.Foster@dot.gov>
Cc: Ciccarone, Michael (PHMSA) <m.ciccarone@dot.gov>; Constantino, Lindsey (PHMSA) <l.constantino@dot.gov>; DerKinderen, Dirk (PHMSA) <Dirk.DerKinderen@dot.gov>
Subject: FW: request for interpretation

Good Afternoon Team,
Please see the Interpretation request below. Many thanks, Barbara

From: Jeff Messer [<mailto:jeff.messer@cfidrive.com>]
Sent: Friday, June 29, 2018 2:43 PM
To: Alston, Barbara CTR (PHMSA) <Barbara.Alston.CTR@dot.gov>
Subject: request for interpretation

I am writing to see if the attached shipping papers is follows all DOT regulations. I am wanting to makes sure this either does or does not meet the regulation of 172.201(c). Because what is titles Bill of Lading is marked page 1 of 1 the shipper could not use the next set of pages (the manifest) as part of the shipping paperwork unless the top of every page is marked page 1 of 4, 2 of 4, etc.

CFI

Jeff Messer
Safety Analyst

4701 East 32nd Street
Joplin, MO 64804, USA
O: +1 800-641-4747 ext 25561

This e-mail and any files transmitted with it are confidential and solely for the use of the individual or entity to which they are addressed and intended. If you have received this e-mail in error, please notify the sender by return e-mail. If you are not the intended recipient, you may not read, copy, retain, print, disclose, or distribute this message or its contents to any other individual, for such actions may be unlawful. WARNING: We take

certain precautions to prevent viruses, but we are not responsible for loss or damage arising from the use of this e-mail or attachments.

Date: 6-26-18

BILL OF LADING

3:45
6/26/18
DB

SHIP FROM	Bill of Lading Number
Sportsman's Dist. Co 902 BPS Outdoor World 2500 E Kearney Springfield MO 65898	Carrier Name: CFI

SHIP TO	SPAC
Outdoor World #85 5472 Rocklin Crossing Drive Rocklin CA 95677	Trailer #: 45181 RCK
	Seal #: 3163

SPECIAL INSTRUCTIONS:	Pro Number:
Bass Pro c/o Werner VAS PO Box 45916 Omaha, NE 68145-0916	

See Attached Hazardous Material Summary	Freight Charge Terms (Freight charges are prepaid unless marked otherwise):
In Case of Emergency: Call 1-800-255-5924	Prepaid <input checked="" type="checkbox"/> Collect <input type="checkbox"/> 3rd Party <input type="checkbox"/>

451-8346 Bass Pro BE 1441
Tour #: 14742870

CUSTOMER ORDER INFORMATION				
Customer Order No.	# of Packages	Weight	Pallet/Slip (circle one)	Additional Shipper Information
			Y N	
			Y N	
			Y N	
			Y N	
Grand Total				

CARRIER INFORMATION									
Handling Unit		Package		Weight	HM (X)	Commodity Description	LTL Only		
Qty	Type	Qty	Type				NMFC No.	Class	
				21,261		Misc. Sporting Goods			

Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property as follows: "The agreed or declared value of the property is specifically stated by the shipper to be not exceeding _____ per _____"
COD Amount: \$
 Fee terms: Collect Prepaid Customer check acceptable

Note: Liability limitation for loss or damage in this shipment may be applicable. See 49 USC § 14706(c)(1)(A) and (B).

Received, subject to individually determined rates or contracts that have been agreed upon in writing between the carrier and shipper, if applicable, otherwise to the rates, classifications, and rules that have been established by the carrier and are available to the shipper, on request, and to all applicable state and federal regulations.	The carrier shall not make delivery of this shipment without payment of charges and all other lawful fees.
Shipper Signature/Date: 6-26-18 <i>Denise Brahe</i>	Shipper Signature
Trailer Loaded: <input checked="" type="checkbox"/> By shipper <input type="checkbox"/> By driver	Freight Counted: <input checked="" type="checkbox"/> By shipper <input type="checkbox"/> By driver/pallets said to contain <input type="checkbox"/> By driver/pieces
This is to certify that the above named materials are properly classified, packaged, marked, and labeled, and are in proper condition for transportation according to the applicable regulations of the DOT.	Carrier Signature/Pickup Date: X <i>B. U. H.</i> 6/26/18 Carrier acknowledges receipt of packages and required placards. Carrier certifies emergency response information was made available and/or carrier has the DOT emergency response guidebook or equivalent documentation in the vehicle. Property described above is received in good order, except as noted.

DATE...: 6/26/18
TIME...: 11:16:27
USER ID: RSUP
DISPLAY: RSUP

SPORTSMAN'S DISTRIBUTION CO
TRAILER HAZMAT LIST
ROCKLIN

SYS...: SYSONE
PGM...: DSTRMR1R 02
FREQ.: ON REQUEST
PAGE.: 1

Origination:
SPORTSMAN'S DISTRIBUTION CO
2300 E. TURNER
SPRINGFIELD MO 65898

Ship to:
ROCKLIN OUTDOOR WORLD
5472 CROSSINGS DR.
ROCKLIN CA 95677

Date: 6/26/18 Carrier: CFI

Shipment: 45181RCK / 216086

Seal No.: 3163 Broken by: _____ Witness: _____

*** Start of Hazardous Materials Summary ***

Emergency Contact 800-451-8346 Bass Pro\3E #9441

Hazardous material	Weight/Carton
LIBOTH, UN3091 AND UN3041 CONTAINS BOTH BATTERIES, 9,	4 lbs 2 ctns
NA3178, SMOKELESS POWDER FOR SMALL ARMS, 4.1, I	2 lbs 2 ctns
Exemptions: EX-2001120228, EX-200120228	
UN0012, CARTRIDGES, SMALL ARMS, 1.4, , LTD QTY	953 lbs 593 ctns
UN0012, CARTRIDGES, SMALL ARMS, 1.4,	333 lbs 32 ctns
UN0044, PRIMERS, CAP TYPE, 1.4,	4 lbs 30 ctns
Exemptions: EX-8710234B, EX-9503142E	
UN0323, CARTRIDGES, POWER DEVICE, 1.4, , LTD QTY	1 lbs 1 ctns
UN0349, ARTICLES, EXPLOSIVE, N.O.S., 1.4,	1 lbs 6 ctns
Exemptions: DOT-E 8006	
UN0373, SIGNAL DEVICES, HAND, 1.4,	5 lbs 4 ctns
Exemptions: EX-8604106	
UN0378, PRIMERS, CAP TYPE, 1.4,	1 lbs 10 ctns
Exemptions: EX1997090062, EX1999010161	
UN0403, FLARES, AERIAL, 1.4,	1 lbs 3 ctns
Exemptions: EX 2002110107, EX2004110275	
UN1013, CARBON DIOXIDE, 2.2, , LTD QTY	12 lbs 6 ctns
UN1057, LIGHTERS, 2.1,	11 lbs 36 ctns
Exemptions: MI-14-6907, T-0434	
UN1057, LIGHTER REFILLS, 2.1, , LTD QTY	1 lbs 1 ctns
UN1075, LIQUEFIED PETROLEUM GAS, 2.1,	430 lbs 240 ctns

DATE...: 6/26/18
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USER ID: RSUP
DISPLAY: RSUP

SPORTSMAN'S DISTRIBUTION CO
TRAILER HAZMAT LIST
ROCKLIN

SYS...: SYSONE
PGM...: DSTRMR1R 02
FREQ.: ON REQUEST
PAGE.: 2

Origination:
SPORTSMAN'S DISTRIBUTION CO
2300 E. TURNER
SPRINGFIELD MO 65898

Ship to:
ROCKLIN OUTDOOR WORLD
5472 CROSSINGS DR.
ROCKLIN CA 95677

Date: 6/26/18 Carrier: CFI

Shipment: 45181RCK / 216086

Seal No.: 3163 Broken by: _____ Witness: _____

Hazardous material	Weight/Carton
UN1133, ADHESIVES, 3, II, LTD QTY	1 lbs 3 ctns
UN1866, RESIN SOLUTION, FLAMMABLE, 3, II, LTD QTY	2 lbs 2 ctns
UN1897, TETRACHLOROETHYLENE, 6.1, III, LTD QTY	1 lbs 2 ctns
UN1944, MATCHES, SAFETY, 4.1, III Exemptions: LTD QTY, MATCHES, SAFETY, SAFETY MATCHES, UN1944	7 lbs 59 ctns
UN1950, AEROSOLS, 2.2, , LTD QTY	19 lbs 46 ctns
UN1950, AEROSOLS, 2.1, , LTD QTY	4 lbs 12 ctns
UN2037, GAS CARTRIDGES, 2.1, , LTD QTY	2 lbs 2 ctns
UN2800, BATTERIES, WET, NON-SPILLABLE, 8, III Exemptions: NON-SPILLABLE	12 lbs 3 ctns
UN2990, LIFE-SAVING APPLIANCES, SELF INFLATING, 9,	13 lbs 8 ctns
UN3082, ENVIRONMENTALLY HAZARDOUS SUBSTANCE, LIQUID, N.O.S., 9, III, LTD QTY	1 lbs 1 ctns
UN3090, LITHIUM METAL BATTERIES, 9, Exemptions: LITHIUM METAL	3 lbs 14 ctns
UN3091, LITHIUM BATTERIES, CONTAINED IN EQUIPMENT, 9, Exemptions: LITHIUM METAL	8 lbs 49 ctns
UN3091, LITHIUM BATTERIES, PACKED WITH EQUIPMENT, 9, Exemptions: LITHIUM METAL	3 lbs 2 ctns
UN3481, LITHIUM ION BATTERIES CONTAINED IN EQUIPMENT, 9, Exemptions: LITHIUM ION	10 lbs 8 ctns
UN3481, LITHIUM ION BATTERIES PACKED WITH EQUIPMENT, 9, Exemptions: LITHIUM METAL	5 lbs 5 ctns

DATE...: 6/26/18
TIME...: 11:16:27
USER ID: RSUP
DISPLAY: RSUP

SPORTSMAN'S DISTRIBUTION CO
TRAILER HAZMAT LIST
ROCKLIN

SYS...: SYSONE
PGM...: DSTRMR1R 02
FREQ.: ON REQUEST
PAGE.: 3

Origination:
SPORTSMAN'S DISTRIBUTION CO
2300 E. TURNER
SPRINGFIELD MO 65898

Ship to:
ROCKLIN OUTDOOR WORLD
5472 CROSSINGS DR.
ROCKLIN CA 95677

Date: 6/26/18 Carrier: CFI

Shipment: 45181RCK / 216086

Seal No.: 3163 Broken by: _____ Witness: _____

==== Weight limit warnings =====

No warnings for this shipment.

==== Placard requirements =====

No placards for this shipment.

Emergency Contact 800-451-8346 Bass Pro\3E #9441

*** End of Hazardous Materials Summary ***