



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

May 22, 2020

Robert A. Kidder
Technical Sergeant
New York State Police
State Route 7, Box 300
Sidney, NY 13838

Reference No. 20-0017

Dear Sergeant Kidder:

This letter is in response to your February 20, 2020, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the requirements for hazardous materials (hazmat) shipping papers. Specifically, you ask whether certain abbreviations indicated on Environmental Protection Agency (EPA) Form 8700-22 would comply with the requirements of the HMR to include the type of packaging and unit of measurement on the hazmat shipping paper.

We have paraphrased and answered your questions as follows:

- Q1. You ask whether “DF” as indicated on EPA Form 8700-22 is an acceptable abbreviation for a “plastic drum” when describing the packaging type on a hazmat shipping paper.
- A1. Section 172.202(a)(7) of the HMR requires that the number and type of packages be entered as part of the shipping description on a hazmat shipping paper. This section allows for the use of abbreviations to indicate the type of packaging provided the abbreviations are commonly accepted and recognizable. Although the abbreviation “DF” is commonly used on EPA hazardous waste manifests to indicate the presence of plastic and/or fiberboard drums, it may not be easily recognizable without the use of a legend or list of abbreviations. Therefore, to avoid confusion in the enforcement or emergency response community that may result in the issuance of a ticket or frustration of the shipment, it is recommended that a legend of EPA’s abbreviations be included on the hazmat shipping paper.
- Q2. You ask whether “P” as indicated on EPA Form 8700-22 is an acceptable abbreviation for “pounds” when describing the total quantity of liquid hazardous material on a hazmat shipping paper.
- A2. Section 172.202(a)(5) of the HMR requires that the total quantity, including the unit of measurement of the hazardous materials covered by the description, be included on a hazmat shipping paper (except for bulk packages, cylinders, and packages containing

only hazardous material residue). Abbreviations may also be used to express units of measurement. Similar to Answer A1, although the abbreviation “P” is commonly used on EPA hazardous waste manifests to indicate total weight in pounds, it may not be easily recognizable without the use of a legend or list of abbreviations. Therefore, to avoid confusion in the enforcement or emergency response community that may result in the issuance of a ticket or frustration of the shipment, it is recommended that a legend of EPA’s abbreviations be included on the hazmat shipping paper.

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

Sincerely,

A handwritten signature in blue ink that reads "T. Glenn Foster". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

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

Dodd, Alice (PHMSA)

From: INFOCNTR (PHMSA)
Sent: Thursday, February 20, 2020 11:41 AM
To: Hazmat Interps
Subject: FW: PHMSA Written Request for Interpretation
Attachments: Shipping document subject of Roadside stop (NYSPC0213647).pdf; Kidder_LOI_2-20-20.docx

Hello Alice and Ikeya,

Please see below for letter of interpretation request.

Thank you,
Kathryn, HMIC

From: KIDDER, ROBERT (TROOPERS) [mailto:ROBERT.KIDDER@troopers.ny.gov]
Sent: Thursday, February 20, 2020 10:59 AM
To: PHMSA HM InfoCenter <PHMSAHMInfoCenter@dot.gov>
Subject: PHMSA Written Request for Interpretation

Please allow this email to serve as a request for formal written interpretation from PHMSA concerning the use of abbreviations for packaging types and applicable units of measurement on a Hazardous Materials Shipping Paper.

- 1.) In the following case, is it acceptable for the shipper to use the letter designation as "DF" as an abbreviation for the packaging type of a plastic drum, while being shipped on a Hazardous Materials Shipping Paper?
- 2.) In the following case, is it acceptable for the shipper use the letter "P" as an abbreviation for "pounds" on a shipment of liquid hazardous material, while being shipped on a Hazardous Materials Shipping Paper?

In this case (reference the attached Hazardous Materials Shipping Paper) the material being shipped was listed on a generic Hazardous Materials Shipping Paper and was not presented on a Hazardous Waste Manifest (EPA form 8700-22).

The HMSP in box 12 lists the Container Type in rows 2 and 3 as "DF". During the HM inspection, the packaging type was determined to be a plastic drum with a removable head (1H2). 172.202(a)(7) specifies that 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.

The HMSP in Box 14 lists the header as "Unit Wt./Vol." with the designation of "P" in the 3 rows below. While 172.202(c)(1) specifies that 'Abbreviations may be used to express units of measurement and types of packagings', the position of the inspector of this shipment is that the letter "P" as a unit of weight or volume is not commonly accepted and recognizable and that he had no way of determining if the designation was in fact an abbreviation for "P" for Pounds or was in fact an abbreviation for "P" for Pints (as the shipment was a liquid).

While the EPA Hazardous Waste Manifest (form 8700-22) requires the use of specific abbreviations for units of measure such as P=Pounds, N=Cubic Meters and M=Metric Tons, and requires separate abbreviations for packaging types such as

DF=Fiberboard or plastic drums, barrels, kegs or CF=Fiber or plastic boxes, cartons, or cases, an abbreviation guide is included on the back of the form for reference.

It is our position that the use of these letters from EPA Form 8700-22 as abbreviations for packaging types and applicable units of measurement on generic Hazardous Materials Shipping Papers are not commonly accepted and recognizable, can be easily misinterpreted without the inclusion of a reference table, and should not be used on the HMSP.

Thank you.

Robert A. Kidder

Technical Sergeant, Troop C Commercial Vehicle Enforcement Unit

New York State Police

State Route 7, Box 300 Sidney New York 13838

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BILL OF LADING

Generator EPA ID #
CESQG

1. Document No. **SYR19622**
2. Page 1 of 1
Site Address

3. Generator's Name and Mailing Address

14072

TOPS # 517

1
13045

5. Transporter 1 Company Name
ENVIRONMENTAL PROD & SVCS OF VT INC.

6. EPA ID #
1

A. State Transporter's ID

B. Transporter 1 Phone

7. Transporter 2 Company Name

8. EPA ID #

C. State Transporter's ID

D. Transporter 2 Phone

9. Designated Facility Name and Site Address

S OF VT, INC.

10. EPA ID #

NYR000115733

E. State Facility's ID

F. Facility's Phone

11. Shipping Name

12. Containers

13. Total Quantity

14. Unit Wt/Vol

a. **NON-RCRA, NON-DOT, LIQUIDS, N.O.S. (LAB PACK)**

02

DM

P

b. **UN1719, Caustic alkali liquids, n.o.s. (SODIUM HYPOCHLORITE solution) 8, II**

01

DF

10

P

c. **UN1993, Flammable liquids, n.o.s. (ACETONE), 3, II**

01

DF

P

G. Additional Descriptions for Materials Listed Above

Document # **D12620** Job #: **N19720** PO#

1) 3306-LP **1** X55GAL #LP 1,4,5,6,7,8,9,2) 3308-CE ERG#154 **1** X5GAL DF LP#2 3) 11021 - CE ERG#128 **1** X5 GAL DF LP#3 **1** X30GAL LP **DOO2** **DOO1 U**

15. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: hereby certify that the above named materials are properly classified, described, according to the applicable regulation of the Department of Transportation. The materials described on this document

Name

Date

Month Day Year

2 1 20

Date

Month Day Year

Date

Month Day Year

17. Transporter 1 Acknowledgement of Receipt of Materials

18. Transporter 2 of Receipt of Materials

Printed/Typed Name

Signature

19. Discrepancy Indication Space

20. Facility Owner or Operator; Certification of receipt of the materials covered by this bill of lading except as noted in item 19.

Printed/Typed Name

Signature

Date

Month Day Year

2 1 20

BILL OF LADING

GENERATOR

TRANSPORTER

FACILITY

rt

✓

[Signature]