



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

1200 New Jersey Avenue, SE
Washington, DC 20590

June 8, 2021

Ms. Shannon Schick
Bulk Hazardous Materials Safety Manager
Schneider National Bulk Carriers
1555 Glory Road
Green Bay, WI 54304

Reference No. 21-0025

Dear Ms. Schick:

This letter is in response to your March 9, 2021, letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to emergency response information requirements. In your letter, you state that you primarily use the Emergency Response Guidebook (ERG) as the form of accessible emergency response information and that you train your fleet to insert the shipping paper on the first corresponding orange page in the ERG to meet the applicability and accessibility requirements for emergency response information specified in §§ 172.600 and 172.602.

Please note that our responses are based on the assumption that the shipping paper and ERG are placed in a location of the cab of the vehicle that would otherwise meet the requirements of § 177.817(e). As such, we have paraphrased and answered your questions as follows:

- Q1. You ask whether it is permissible to place the shipping paper on top of the ERG without the ERG having any placeholders in it.
- A1. The answer is yes. If a carrier uses the ERG to fulfill the emergency response information requirements, use of the proper shipping name and the United Nations (UN) identification number identified on a shipping paper is an acceptable method to cross-reference the applicable entry in the ERG.
- Q2. You ask whether placeholders are required to be inserted in the ERG and if so, must they bookmark the specific pages in the orange section of the ERG to correspond with a hazardous material listed on the shipping paper.

- A2. Placeholders in the ERG are not necessary if the vehicle transporting the hazardous materials contains the entire ERG. As stated in A1, use of the proper shipping name and the UN identification number identified on the shipping paper is an acceptable method to cross-reference the applicable entry in the ERG.
- Q3. You ask whether the emergency response information requirements are met if the shipping paper is placed in the ERG on a page corresponding to one of the hazardous materials being transported but the other hazardous materials being transported are not “tabbed” in the ERG.
- A3. The answer is yes. The shipping paper description for a hazardous material contains both a proper shipping name and an identification number. That information, in conjunction with the “Name of Material” and “ID No.” indexes contained in the ERG, may be used to cross-reference the description of the hazardous material with the emergency response information contained in the ERG. Therefore, “tabbing” of the ERG is not required.

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

Sincerely,



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

From: [INFOCNTR \(PHMSA\)](#)
To: [Dodd, Alice \(PHMSA\)](#); [Hazmat Interps](#)
Subject: FW: Letter Of Interpretation Request
Date: Wednesday, March 10, 2021 11:07:22 AM
Attachments: [Letter Of Interpretation.docx](#)

Good morning Alice,

Please see the attached request for a letter of interpretation.

Please contact our office with any questions.

Thank you,

Sarah (HMIC)

From: Schick, Shannon [mailto:SchickS@schneider.com]
Sent: Tuesday, March 9, 2021 1:40 PM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Subject: Letter Of Interpretation Request

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hi Folks,

We're hoping we can trouble you for a letter of interpretation regarding the attached file. Please let me know if you need any additional information and thank you in advance!

Thanks,

Shannon Schick
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Schneider National Bulk Carriers
920-592-5048
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