Baker

22-0039

From: INFOCNTR (PHMSA)
To: Dodd, Alice (PHMSA)
Cc: Hazmat Interps
Subject: FW: SHIPPER"S DECLARATION FOR DANGEROUS GOODS (AIR and OCEAN)
Date: Tuesday, May 10, 2022 4:02:31 PM

Hi Alice,

Please see the below interpretation request.

Should you have any questions, please let me know.

Regards,

-Breanna

From: Dennis Raymund (DHL US) <dennis.franco@dhl.com>
Sent: Tuesday, April 26, 2022 6:32 PM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Subject: RE: SHIPPER'S DECLARATION FOR DANGEROUS GOODS (AIR and OCEAN)

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 Brenna,

I would like to request an official letter of interpretation about this:

- Can a Freight Forwarder complete the 5-basic description of the shipment, to include any relevant special handling on the Shipper Papers for the transport of Dangerous Good?
- The Freight Forwarder will only use The SDS (Safety Data Sheet) under section 14 to construct the description of the shipment.
- The Certification Statement will be signed by the shipper/Customer who have completed the HAZMAT Training (multi-modal)

The Certification Statement:
"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 labelled/placarded and are in all respects in proper condition for transport according to applicable international and national governmental regulations."

Thank you,

Dennis Raymund V. Franco
Manager DG Compliance

DHL Global Forwarding
22879 Glenn Drive, Suite 100
Sterling, VA, 20164, United States of America
iPhone: +1 703-826-1229

Email: dennis.franco@dhl.com

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From: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Sent: Tuesday, April 26, 2022 3:53 PM
To: Dennis Raymund (DHL US) <dennis.franco@dhl.com>
Subject: RE: SHIPPER'S DECLARATION FOR DANGEROUS GOODS (AIR and OCEAN)

Dear Dennis**,**

We have received your inquiry about the hazardous materials regulations (49 CFR Parts 171-180). The hazardous materials regulations are available at the following URL:

https://www.ecfr.gov/cgi-bin/text-idx?SID=1d49a3b137cb1b6fc45251074e634b44&tpl=/ecfrbrowse/Title49/49tab_02.tpl

We attempted to contact you by phone but were unable to reach you. We are also very limited in our ability to answer your questions by e-mail. However, a hazardous materials regulatory specialist would be happy to speak with you regarding your inquiry. You may contact the Hazardous Materials Information Center, which is staffed with regulatory specialists who can quickly answer your questions by phone, Monday through Friday, 9 AM - 5 PM EST at (800) 467-4922 or (202) 366-4488. Alternatively, if you would like a regulatory specialist to contact you directly, please respond to this e-mail with a telephone number where you can be reached between 9 AM and 5 PM EST.

Sincerely,

Breanna, Hazardous Materials Specialist

An e-mail response from this office is considered informal guidance. Formal guidance may be requested in accordance with 49 CFR 105.20. https://www.phmsa.dot.gov/standards-rulemaking/hazmat/hazardous-materials-information-center

From: Dennis Raymund (DHL US) <dennis.franco@dhl.com>
Sent: Sunday, April 3, 2022 7:14 PM
To: Dodd, Alice (PHMSA) <Alice.Dodd@dot.gov>; Foster, Glenn (PHMSA) <Glenn.Foster@dot.gov>; Patrick, Eamonn (PHMSA) <eamonn.patrick@dot.gov>; Pfund, Duane (PHMSA) <Duane.Pfund@dot.gov>; INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Subject: SHIPPER'S DECLARATION FOR DANGEROUS GOODS (AIR and OCEAN)

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.

Good morning All,
Can a Freight Forwarder complete the 5-basic description of the shipment, to include any relevant special handling on the Shipper Papers for the transport of Dangerous Good? The Freight Forwarder will only use The SDS (Safety Data Sheet) under section 14 to construct the description of the shipment.

The Certification Statement:
"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 labelled/placarded and are in all respects in proper condition for transport according to applicable international and national governmental regulations."

For air transport the following additional statement is "I declare that all of the applicable air transport requirements have been met."

The Name of Signatory will be signed by the Customer/Shipper himself and not the Freight Forwarder, **Is that acceptable?** or a possible violation of the US Code of Federal Regulation?

Thank you,

Dennis Raymund V. Franco
Manager DG Compliance
DHL Global Forwarding
22879 Glenn Drive, Suite 100
Sterling, VA, 20164, United States of America
iPhone: +1 703-826-1229
Email: dennis.franco@dhl.com

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