



U.S. Department
of Transportation
**Research and
Special Programs
Administration**

400 Seventh St., S.W.
Washington, D.C. 20590

AUG 3 2000

Mr. Garry Howell
Overnite Transportation Company
PO Box 246
Gaffney, SC 29342

Ref. No. 00-0185

Dear Mr. Howell:

This is in response to your letter dated June 29, 2000, regarding units of measurement required in a shipping paper entry under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if the quantity of a material listed on a shipping paper must include units of measurement, or if the units of measurement may appear at the top of a column as a heading.

Section 172.202(a)(5) requires that the total quantity, including the unit of measurement, of the hazardous material covered by the description to appear on the shipping paper. Displaying the unit of measurement at the top of a column as a heading, rather than by each entry, is an acceptable method for compliance. However, the unit of measurement listed at the top of a column must apply to every entry below it and must appear on every page of multi-page shipping papers.

I hope this information is helpful. If you have further questions, please do not hesitate to contact this Office.

Sincerely,

Delmer F. Billings
Chief, Standards Development
Office of Hazardous Materials Standards



000185

172.202

OVERNITE TRANSPORTATION COMPANY

P.O. BOX 246 / GAFFNEY, SC 29342



6/29/2000

Mr. Edward Mazullo
Director Of Hazardous Materials Standards
400 Seventh Street, S.W.
Washington, DC 20590

Nelson
172-202
00-0185

Dear Mr. Mazullo:

I am writing on behalf of Overnite Transportation Company, Richmond, Virginia in regards to a violation issued by the state of Connecticut. The inspection and violation concerns the unit of measure being shown on the shipping papers. The inspector references Violation Code 18.817(a) which will then refer you to 172.202(a)5, & (c).

It is our understanding that a shipping document with a column headed by the word: [WEIGHT(lbs)] is an appropriate setup for items shown in pounds, as shown on the attached shipping document #1 but this shipping document was not being used during the inspection.

The shipping document in use from the shipper (# 2) was found to be in violation as only the notation [LBS] was shown over the column. However upon further inspection of the shipping document you find Total Pieces: 2
Total Weight: 96lbs in the body of the bill.

Our concern is if a shipping document with just the heading [LBS] over a column is correct or if a column with [WEIGHT(lbs)] is correct, or if either are appropriate to use.

I appreciate your time and interest in this matter and await your reply. I can be contacted at 864-489-1173 or Fax 864-487-5694. Mail to Overnite Transportation Company PO Box 246 Gaffney, SC 29342.

Sincerely;

Garry Howell
Environmental Supervisor