



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

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

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

Reference No.: 01-0223

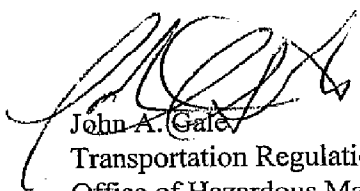
Dear Mr. Howell:

This is in response to your letter requesting clarification of the shipping paper requirements for ORM-D materials under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Your questions are paraphrased and answered as follows:

- Q1. When a material is described as "Consumer commodity, ORM-D" on a shipping document, can the "X" be placed in the "HM" column and if so, is the entry required or optional?
- A1. Even though § 172.200 excepts a Consumer commodity, ORM-D material from the shipping paper requirements, except when offered or intended for transportation by air, it is permissible to place an "X" in the "HM" column on the shipping document.
- Q2. If a shipping document has an entry for a material that is not subject to the shipping paper requirements, is the emergency response telephone number, shipper certification and shipper signature required?
- A2. The answer is no. The requirements of Subpart G do not apply to a hazardous material that is excepted from the shipping paper requirements (see § 172.600(d)).

I trust this satisfies your request.

Sincerely,



John A. Gale

Transportation Regulation Specialist
Office of Hazardous Materials Standards



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OVERNITE TRANSPORTATION COMPANY

P.O. BOX 246 / GAFFNEY, SC 29342



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\$172.201
Shipping Papers
01-0ZZ3

Mr. Edward Mazullo
Director of Hazardous Material Standards
400 Seventh St, S.W.
Washington, DC 20590

Dear Mr. Mazullo:

I am writing on behalf of Overnite Transportation Company Richmond, Virginia requesting an interpretation in writing on the following.

When a description of (Consumer Commodity ORM-D) is shown on a shippers bill of lading. Can the X be place in the H/M column of the shipping paper, and if so, would the X be (required) or an (option).

Second item of concern is if the shipper uses this description, class, and X in the H/M column , ,which are excepted from the shipping paper requirements. Does this now require the shipper to also show an emergency response telephone number, shippers certification, and shippers signature.

I appreciate your time in this matter and await your response.

Response can be mailed to Overnite Transportation Company
PO Box 246 Gaffney, SC 29342 Att; Garry Howell

Sincerely;

Garry Howell

Garry Howell
Environmental Supervisor