



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

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

JAN 17 2006

Mr. John Anderson
Airgas-SAFECOR
P.O. Box 20067
Cheyenne, WY 82003

Ref. No. 05-0180

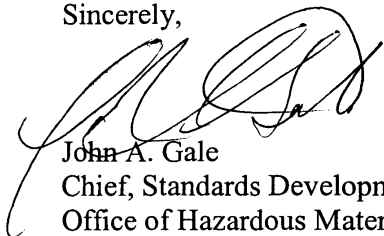
Dear Mr. Anderson:

This responds to your July 7, 2005 email requesting clarification on shipping paper descriptions under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if it is permissible to split the proper shipping description between two pages of the shipping paper.

Section 172.202(b) of the HMR requires the basic shipping description to be shown in sequence with no additional information interspersed. The basic shipping description must be easily recognizable and available to emergency responders in the event of an incident. Section 172.201(c) permits information to be carried over to additional pages of a shipping paper. Thus, depending on the format used, it may be permissible for a shipping description to be split between two pages of the shipping paper. However, the example you provided does not conform to the requirements in § 172.202(b) because the additional information included on your shipping paper makes it difficult to identify the complete shipping description.

I hope this answers your inquiry.

Sincerely,



John A. Gale
Chief, Standards Development
Office of Hazardous Materials Standards



050180

172.202

Mitchell, Hattie <PHMSA>

Boothe
§ 172.202
Shipping Papers
05-0180

From: John Anderson (SAFECOR) [John.Anderson@Airgas.com]
Sent: Thursday, July 07, 2005 6:36 PM
To: Mitchell, Hattie <PHMSA>
Subject: Request for clarification on hazardous material shipping paper



Corporate eFax
from "802 775 6...

<<Corporate eFax from "802 775 6461" - 3 page(s)>>

Good afternoon,

Please review the following attachment with regard to our request for clarification. The computer program being used for our hazardous material shipping paper will split the DOT proper shipping description between two pages depending on the page break. You will find an example on page one and two. The last entry on page one you will find nitrogen compressed and then at first entry of page two you will find the hazard class and UN number.

We have recently been questioned by DOT enforcement personal about this practice. They have said we can not split the DOT proper shipping description between two pages.

Can you please clarify if this practice in in compliance with 49 CFR?

Thank you.

John Anderson
Airgas-SAFECOR
P.O. Box 20067
Cheyenne, WY 82003
Phone 1-307-778-8809
Fax 1-307-778-7497
john.anderson@airgas.com

FROM : NEA RUTLAND
 RUN DATE: 30-Jun-05 02:17PM

FAX NO. : 802-775-6461

Jul. 06 2005 03:00PM P1

MANIFEST SYSTEM
 Manifest

AIRGAS NORTHEAST
 WH1 RIV JCT-BRANCH 77
 WHITE RIVER JCT, VT 05001
 (802) 295-7173

Route Range: 988 - 988 Delivery date: 06/30/05
 ROUTE : 988 DRIVER : 988 TRUCK : 0

QTY SHIP	RUNNING TOTAL	UNIT	HM	DESCRIPTION & HAZARD CLASS	UNE / PCK GRP	ITEM NUMBER	TOTAL WEIGHT	FILLS GFI	FILLS NET	EMPTIES	QTY SHIP
3	3	CL	X	ACETYLENE, DISSOLVED 2.1 UN1001	AC	5	78				3
				(ACETYLENE SIZE 6 #2 40CF)							
3	6	CL	X	ARGON, COMPRESSED 2.2 UN1006	AR	UNP300	495				3
				(ARGON UNP GR 5.0 SIZE 300) (CGA 580)							
6	12	CL	X	CARBON DIOXIDE 2.2 UN1013	CO	50	1088				6
				(CARBON DIOXIDE 50 LBS CGA 320)							
1	13	CL	X	COMPRESSED GASES, N.O.S. (NITROGEN, SULFUR DIOXIDE) 2.2 UN1956	F04	N199E1584.338	55				1
				(EP 43PPM NITRIC OXIDE) (43PPM SULFUR DIOXIDE)							
8	21	CL	X	HELIUM, COMPRESSED 2.2 UN1046	HE	300	1320				8
				(HELIUM INDUSTRIAL SIZE 300) (CGA 580)							
1	22	CL	X	HELIUM, COMPRESSED 2.2 UN1046	HE	USPM	14				1
				(HELIUM MEDICAL USP GR SIZE HE) (CGA 930)							
1	23	CL	X	NITROGEN, REFRIGERATED (LIQUID) 2.2 UN1977	N2	2301222	825				1
				(LIQUID NITROGEN 230LTRS 22PSI)							
1	24	CL	X	NITROGEN, REFRIGERATED (LIQUID) 2.2 UN1977	N2	2301230	825				1
				(LIQUID NITROGEN 230LTRS 230PSI)							
7	31	CL	X	NITROGEN, COMPRESSED	N2	300	1155				7

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

EMERGENCY RESPONSE TELEPHONE NUMBER:
 1-800-372-4651

Authorized Signature _____

Received by _____

FROM : NEA RUTLAND

RUN DATE: 30 Jun 05 07:17PM

FAX NO. : 802-775-6461

Jul. 06 2005 03:00PM P2

MANIFEST SYSTEM
Manifest

Route range: 988 - 988 Delivery date: 06/30/05

ROUTE : 988

DRIVER : 988

TRUCK : 0

QTY SHIP	RUNNING TOTAL	UNIT	HAZ	DESCRIPTION & HAZARD CLASS	HAZ / PCK GRP	---ITEM NUMBER---	UNIT WEIGHT	FILES DEF	FILES REF	FILES EMP	QTY SHIP
6		CL	X	2.2 UN1066 (NITROGEN INDUSTRIAL SIZE 300) (CGA 580) COMPRESSED GASES, N.O.S. (NITROGEN, CARBON DIOXIDE) 2.2 UN1956	HJ	MSDS: 001040 002540	240				6
7		CL	X	(NITROGEN 75 CG 25 SIZE 40) (CGA 580) NITROGEN, REFRIGERATED LIQUID 2.2 UN1977	HJ	MSDS: 002059 L7200L1500	4117				7
9		CL	X	(NITROGEN LASER 200 LTRS 400PSI) OXYGEN, COMPRESSED 2.2 UN1072	OX	MSDS: 001040 USP125	828				9
6		CL	X	(OXYGEN MEDICAL USP SIZE 125) (CGA 540) OXYGEN, REFRIGERATED LIQUID 2.2 UN1073	OX	MSDS: 001043 USP18011130	3890				6
22		CL	X	(LIQUID OXYGEN USP 160 LTRS 230PS) OXYGEN, COMPRESSED 2.2 UN1072	OX	MSDS: 001043 USP800	220				22
27		CL	X	(OXYGEN MEDICAL USP SIZE 8A) (CUSTOMER OWNED CGA 870) OXYGEN, COMPRESSED 2.2 UN1072	OX	MSDS: 001043 USP800	243				27
65		CL	X	(OXYGEN MEDICAL USP SIZE 8A) (CUSTOMER OWNED CGA 870) OXYGEN, COMPRESSED 2.2 UN1072	OX	MSDS: 001043 USP800	910				65
8		CL	X	(OXYGEN MEDICAL USP SIZE 8A) (CUSTOMER OWNED CGA 870) OXYGEN, COMPRESSED 2.2 UN1072	OX	MSDS: 001043 USP800	72				8

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EMERGENCY RESPONSE (711) PHONE NUMBER:
1-800-377-4651

Authorized Signature _____

Received by _____

FROM : NEA RUTLAND

FAX NO. : 802-775-6461

Jul. 06 2005 03:01PM P3

RUN DATE: 30-Jun-05 02:27PM

MANIFEST SYSTEM
Manifest

Route range: 988 - 988 Delivery date: 06/30/05

ROUTE : 988 DRIVER : 988 TRUCK : 0

QTY SHIP	RUNNING TOTAL	UNIT	HM	DESCRIPTION & HAZARD CLASS	UN# / PCK GRP	---ITEM NUMBER--	TOTAL WEIGHT	EMPTY DEL	EMPTY RET	EMPTY CITIES	CYL SHIP	
						MSDS: 001043						
306		CL	X	(OXYGEN MEDICAL USP SIZE HD) (CGA 870) OXYGEN, COMPRESSED 2.2 UN1972	0X USPWE		4284				306	
						MSDS: 001043						
1		CL	X	(OXYGEN MEDICAL USP SIZE NF) (CGA 870) COMPRESSED GASES, N.O.S. (NITROGEN, OXYGEN) 2.2 UN1958	703 N1832ME0106		14				1	
				(80% CARBON DIOXIDE) (12% OXYGEN)		MSDS: 001958						
TOTALS								21083				488

Total Cyl: 488 Full Ret: _____ Empty Ret: _____

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

EMERGENCY RESPONSE TELEPHONE NUMBER:
1-888-372-4251

Authorized Signature _____

Received by _____