



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, D.C. 20590

NOV 5 2007

Ms. Amy Fishchesser
Sun Chemical Corporation
5020 Spring Grove Avenue
Cincinnati, OH 45232

Ref. No. 07-0188

Dear Ms. Fishchesser:

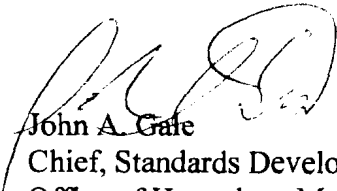
This responds to your September 26, 2007 letter requesting clarification of the shipping paper requirements under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask whether the following abbreviations are acceptable for compliance with the requirement to list the type of package(s) on a shipping paper:

<u>Package Type</u>	<u>Abbreviation</u>
Tote	TOTE
Drum	DR
Pail	PL
Boxes	BOXES

Section 172.202(a)(7) requires the number and type of packages to be indicated on a shipping paper. That section permits the use of abbreviations to indicate package type provided the abbreviations are commonly accepted and recognizable. It is the opinion of this office that the package type abbreviations that you provided in your letter are both commonly accepted and recognizable and are acceptable for describing the type of package(s) on a shipping paper.

I hope this information is helpful. Please contact us if you require additional assistance.

Sincerely,


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

Eichenlaub
§ 172.202
Shipping Papers
07-0188

Drakeford, Carolyn <PHMSA>

From: INFOCNTR <PHMSA>
Sent: Thursday, September 27, 2007 2:50 PM
To: Drakeford, Carolyn <PHMSA>
Subject: FW: Information Center Comments/Questions

Carolyn,

Could you process this as a formal request for interpretation? Thanks.

Erin

-----Original Message-----

From: amy.fischesser@na.sunchem.com [mailto:amy.fischesser@na.sunchem.com]
Sent: Wednesday, September 26, 2007 4:28 PM
To: INFOCNTR <PHMSA>
Subject: Information Center Comments/Questions

Below is the result of your feedback form. It was submitted by Amy Fischesser (amy.fischesser@na.sunchem.com) on Wednesday, September 26, 2007 at 16:27:45.

Email: amy.fischesser@na.sunchem.com

Name: Amy Fischesser

Category: Hazardous Materials Table, Special Provisions, Hazardous Materials Communications

Organization: Sun Chemical Corporation

Street: 5020 Spring Grove Avenue

City: Cincinnati

State: Ohio

Zip Code: 45232

Phone: 513.484.7657

Fax: 513.632.1531

Comments: RE: 172.202(a)(6) requesting clarification.

Sun Chemical ships our hazmat in totes, drums; pails, boxes. When we ship we described as follows: (e.g.) 2 TOTE; 3 DR; 2 PL; 2 BOXES. Wilson Trucking has advised Sun Chemical that we have to say 2 IBC; 2 DRUMS. They said that Tote; DR & PL are not acceptable terminology and abbreviations.

The gentleman I spoke with at Wilson Trucking (Ron Maxey) said he attended a PHMSA class in May in Raleigh, NC and Jack Witley from PHMSA said that totes had to be referred to as IBCs and that the abbreviation DR was unacceptable and had to be spelled out as "DRUM".

I talked with Mike Stevens on the DOT Hotline and he said Sun was not out of compliance -- we are okay with how we are describing our packaging. He said that as long as the trucking company/carrier is clear as to what they are accepting and a DOT inspector would be, we were okay.

However, Wilson Trucking will not accept this conversation I had with Mike Stevens.

I would appreciate clarification on what is acceptable and what is not acceptable. If Sun

must use the term IBC instead of Tote, this will involve a major computer change.

Thank you very much for your assistance.

Amy Fischesser
Corporate Hazardous Goods Transportation Manager Sun Chemical Corporation