



U.S. Department
of Transportation

Pipeline and Hazardous Materials
Safety Administration

1200 New Jersey Ave., SE
Washington, DC 20590

OCT 31 2008

Mr. Chris W. Gibson
EHS&R Manager
Hawkins, Inc.
3100 East Hennepin Avenue
Minneapolis, MN 55413

Reference No. 08-0134

Dear Mr. Gibson:

This is in response to your letter asking for clarification of requirements for a multi-page shipping paper under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). You state your company receives orders for hazardous materials at different times from the same customers and creates a new shipping paper for each order. As a result, your drivers sometimes deliver several orders to the same customer with different shipping documents. You ask us to assume the emergency response telephone numbers, shipper certification statements and signatures, and net and/or gross weights of the materials are identical. We paraphrased your questions and answered them in the order provided. We apologize for the delay in responding and regret any inconvenience this may have caused.

Q1. Must a multi-page shipping paper comply with § 172.201(c)?

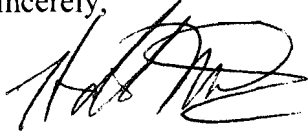
A1. Yes. Under § 172.201(c), a shipping paper may consist of more than one continuation page if each page in the shipping paper is numbered and the first page has a notation specifying the total number of pages, e.g., "Page 1 of 4 pages." However, individual shipping papers are not considered a multi-page shipping document under the HMR.

Q2. Must a multi-page shipping paper have only one signed shipper certification statement under § 172.204?

A2. Yes, only one signed certification statement is required for a multi-page shipping paper. This signed certification can appear on the first or top page of the multi-page shipping paper. Also, please note placing the signature anywhere on the same page as the certification statement constitutes signing the certification.

I hope this information satisfies your request.

Sincerely,

A handwritten signature in black ink, appearing to read 'H. Mitchell', written in a cursive style.

Hattie L. Mitchell
Chief, Regulatory Review and Reinvention
Office of Hazardous Materials Standards

HAWKINS, INC.

Edmonson
§ 172.201(c)
§ 172.204
Shipping Papers
08-0134

May 12, 2008

Mr. Edward T. Mazzullo
Director, Office of Hazardous Materials Standards
U.S. DOT/PHMSA (PHH-10)
400 7th Street S.W.
Washington, D.C. 20590-0001

URGENT REQUEST FOR INTERPRETATION

RE: 49 CFR 172.201(c) and 172.204

Dear Mr. Mazzullo:

We are seeking to clarify the differences between a multiple-page shipping paper and a series of individual shipping papers, which are going to the same delivery location.

Assuming that each page has identical elements with regards to emergency response telephone numbers, shipper certifications, net/gross weights, etc, the only difference that we have been able to determine are:

1. Multiple page shipping papers are required to comply with 172.201(c), and
2. Multiple page shipping papers are required to have only one (1) shipper certification signature, per 172.204.

Do you concur with these determinations?

If you have any questions, I can be reached at 612-331-6910, x8551 or at chris.Gibson@hawkinsinc.com

Thank you.

Sincerely,

Chris W. Gibson
EHS&R Manager
Hawkins, Inc.