



U.S. Department of Transportation
**Pipeline and Hazardous Materials
Safety Administration**

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

DEC 6 2011

Dorothea A. Welk
Dangerous Goods Compliance Specialist
DHL Global Forwarding
1905 Raymond Ave. SW.
Renton, WA 98057

Reference No.: 11-0230

Dear Ms. Welk:

This is in response to your September 1, 2011 letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) as they pertain to the immediate availability of emergency response information. Specifically you ask if while a hazardous material is in a warehouse awaiting transport if emergency response information must be available in a hard copy or can it be electronically based and printed when needed.

It is the opinion of this office that a printed hard copy of emergency response information must be present at a facility where a hazardous material is received, stored, or handled during transportation. Emergency response information is required by § 172.600(c)(1) to be immediately available for use at all times hazardous materials are present in the transportation stream. Facility operators where hazardous materials are stored are required by § 172.602(c)(2) to maintain the information required by § 172.602(a) whenever the hazardous material is present and must have the information available in a location that is immediately accessible to facility personnel in the event of an incident involving the hazardous material.

I hope this satisfies your inquiry. Please contact us if we can be of further assistance.

Sincerely,

Delmer Billings
Senior Regulatory Advisor
Standards and Rulemaking Division

DHL Global Forwarding



September 1, 2011

Webb
§172.600(c)(1)
Emergency Response
Information
11-0230

U. S. DOT
PHMSA Office of Hazmat Standards
Attn: PHH-10
East Building
1200 New Jersey Avenue SE
Washington, DC 20590-0001

Ref: 49 CFR Section 172.600 (c) (1)

Gentlemen/Madam,

This section requires that emergency response information about a hazardous material shipment must be immediately available at all times the hazardous material is present.

My question concerns the words "immediately available". When the hazardous material is in a forwarder or airline warehouse awaiting transport in what form does this information need to be immediately available? Must this be a hard copy or can it be contained in a computer to be printed when needed?

Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Dorothea A. Welk".

Dorothea A. Welk
Dangerous Goods Compliance Specialist
Direct Phone: 425-572-3064