

FILE

PUCO EXHIBIT FILING

64.

Date of Hearing: 1/31/12

Case No. 11-5330-TR-CVF

PUCO Case Caption: _____

In the Matter of OPC Polymers

PUCO

2012 FEB 15 PM 2:22

RECEIVED-DOCKET NO. 11

List of exhibits being filed:

Staff Exhibits 1-11

Respondent's Exhibits 1-5

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Reporter's Signature: Valerie Sloas

Date Submitted: 2/13/12

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

- - -

In the Matter of: :
: Case No. 11-5330-TR-CVF
OPC Polymers :

- - -

PROCEEDINGS

Before Kerry K. Sheets, Hearing Examiner, at the Public
Utilities Commission of Ohio, 180 East Broad Street,
Room 11-C, Columbus, Ohio, called at 10:00 a.m. on
Tuesday, January 31, 2012.

- - -

ARMSTRONG & OKEY, INC.
222 East Town Street, Second Floor
Columbus, Ohio 43215-4620
(614) 224-9481 - (800) 223-9481
Fax - (614) 224-5724

- - -

DRIVER/VEHICLE EXAMINATION REPORT

Aspen 2.13.1.2

Public Utilities Commission of Ohio
180 East Broad Street
Transportation Department
Columbus, OH 43215
Phone: (614)466-0429 Fax: (614)752-9274

Report Number: OH9436300386
Inspection Date: 06/09/2011
Start: 8:52:00 AM ET End: 9:37:49 AM ET
Inspection Level: I - Full
HM Inspection Type: Non-Bulk

USF GLEN MOORE INC
1711 SHEARER DRIVE
CARLISLE, PA 17013-0760

USDOT#: 00277356

Phone#: (717)245-0788

MC/MX#: 192952

Fax#:

State#:

Location: ROADSIDE

Highway: US 33

County: HOCKING, OH

MilePost: 4

Origin: COLUMBUS, OH

Destination: GREENSBORO, NC

Shipper: OPC POLYMERS

Bill of Lading: 190381

Cargo: HAZ MAT (ALL)

Driver: HOLMES, ANTHONY

License#: 28154179

State: NC

Date of Birth: 07/14/1965

CoDriver:

License#:

State:

Date of Birth:

VEHICLE IDENTIFICATION

Unit	Type	Make	Year	State	Plate #	Equipment ID	VIN	GVWR	CVSA #	CVSA Issued #	OOS Sticker
1	TT	INTL	2007	TN	T928HY	3216	2HSCNAPR27C551887	80,000		14995694	
2	ST	GDAN	2008	TN	U075651	7120	1GRAP06298T547227	68,000			NA

Unit Cargo Seal Removed #
2 GLEN MOORE 0044872

Cargo Seal Replaced #
PUCO 014826

BRAKE ADJUSTMENTS

Axle #	1	2	3	4	5
Right	1 1/4	1 3/8	1 1/4	1 1/2	1 1/4
Left	1 1/8	1 1/4	1 3/8	1	1
Chamber	C-20	L-30	L-30	L-30	L-30

VIOLATIONS

Section	Type	Unit	OOS	Citation #	Verify	Crash	Violations Discovered
177.834(a)	F	2	Y		A	N	Package not secure in vehicle - no securement to rear driver placed load lock after inspection
173.30	F	2	N		N	N	Loading/unloading transport vehicles

HazMat: 3 Flammable

Placard: Yes Cargo Tank:

Special Checks: No Data for Special Checks.

State Information:

FMCSA Credentials Verified-Y/N: Y; CDL Verified (Y/N): Y; FMCSA OOS Order Issued(Y/N): N; For-Hire Carrier: Y; Reason Code: ISSS;
Driver Address: 2315 CLEAR WATER LN; Driver City: NEWTON; Driver State: NC; Driver Zip: 28658; Photos Taken (Y/N): Y; Orig Seal
Placed by(C/D/S/U): D; Loaded by Shipper (Y/N): Y; Ship Doc Prep by Shipper(Y/N): Y; Haz Class A: 3; ID # A: UN1866; Packing Group A:
II; Gross Weight A: 41721;

Report Prepared By:
TOM FORBES

Badge #:
9436

Copy Received By:
ANTHONY HOLMES

Page 1 of 2



00277356 OH OH9436300386

X

X

STAFF EXHIBIT 1

DRIVER/VEHICLE EXAMINATION REPORT

Aspen 2.13.1.2

Public Utilities Commission of Ohio
180 East Broad Street
Transportation Department
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Destination: GREENSBORO, NC

Shipper: OPC POLYMERS

Bill of Lading: 190381

Cargo: HAZ MAT (ALL)

Driver: HOLMES, ANTHONY

License#: 28154179

State: NC

Date of Birth: 07/14/1965

CoDriver:

License#:

State:

Date of Birth:

* Pursuant to authority contained in Title 49, Code of Federal Regulations, Section 396.9, I hereby declare vehicles with defects followed by an "Y" in the "Out of Service" column in the violations discovered section of this report OUT OF SERVICE. No person shall remove the out of service stickers applied to these vehicles, or operate such vehicles until the out of service defects have been repaired and the vehicles have been restored to safe operating condition.

Signature Of Repairer X: _____ Facility: _____ Date: _____

All violations of the FHMR and FMCSR or Title 49 of the Ohio Revised Code will be reviewed by the PUCO's Transportation Department to determine whether civil forfeitures should be assessed against any responsible parties in accordance with the penalty provisions of Title 49 of the Ohio Revised Code. If civil forfeitures are assessed, you will receive a separate notice by mail. These penalties may be assessed to motor carriers, shippers, and/or drivers.

ATTENTION DRIVER: This report must be sent to the motor carrier whose name appears at the top of this inspection report within 24 hours. If the inspection report cannot be delivered within 24 hours the driver must mail or fax the inspection report to the motor carrier.

ATTENTION MOTOR CARRIER: The motor carrier must examine this report and repair all the vehicle defects/violations noted above -AND- The motor carrier must sign the Certification of Repairs below and return the signed form to: Public Utilities Commission of Ohio-TASD, 180 E. Broad St., Columbus, Oh; 43215-3793 -OR- Fax (614) 752-9274 within 15 days of the inspection. If "No Violations Were Discovered" then you do not need to return this report. Failure to return this report with the required certification can result in penalties up to \$1,000 per day for each day the violation continues, up to a total of \$10,000.

MOTOR CARRIER CERTIFICATION OF COMPLETED REPAIRS: The undersigned certifies that all violations noted on this report have been corrected and action taken to assure compliance with the Federal Motor Carrier Safety & Hazardous Materials Regulations insofar as they are applicable to motor carriers and drivers. A false certification of repairs is required to be prosecuted with penalties up to \$10,000.

Signature Of Motor Carrier X: _____ Title: _____ Date: _____

Report Prepared By:
TOM FORBES

Badge #:
9436

Copy Received By:
ANTHONY HOLMES

Page 2 of 2



X _____

X _____ 00277356 OH OH9436300386

STAFF EXHIBIT 2

mm

FORFEITURE ASSESSMENT

REPORT #

9436300386

COMPLETED BY

T. Persinger

REPORT DATE :

June 9, 2011

DATE ASSESSED

06/21/11

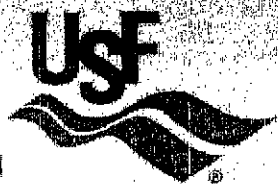
RESPONDENT :

OPC Polymers

		SHIPPER CITED x CARRIER CITED			
	VIOULATION CODE/ DESCRIPTION	173.30 Loading/unloading transport vehicles			
	NATURE GRAVITY 0 -10 PTS.	4	0	0	
	EXTENT OF VIOL. -10 TO +10 PTS.	0	0	0	0
	ACTUAL HARM 0 - 20 PTS.	0	0	0	0
	OTHER CIRCUMST. -10 TO +10 PTS.	0	0	0	0
(A)	SUBTOTAL POINTS 0-50 PTS.	4	0	0	0
(B)	MATERIAL HAZARD	1.1	0		
(C)	AMOUNT OF MATERIAL	1	0		
(D)	SUBTOTAL POINTS = A*(B+C)	8.40	0.00	0.00	0.00
(E)	RESPONDENT CULPABILITY	1	1	1	1
(F)	RESPONDENT HISTORY 1,2,OR 4	1	1	1	1
(G)	TOTAL POINTS = D*E*F	8.40	0.00	0.00	0.00
	FORFEITURE ASSESSED AMOUNT = G * \$100.00	\$840.00	\$0.00	\$0.00	\$0.00



STAFF EXHIBIT 3



7120

USF Glen Moore Inc.

usfc.com

AIR RIDE EQUIPPED

1866

3

STAFF EXHIBIT 4

R-39344
 POLYCHEM 7008-T-60
 174 34 440
 013155008

Polychem 7008-T-60

174 34 440

013155008

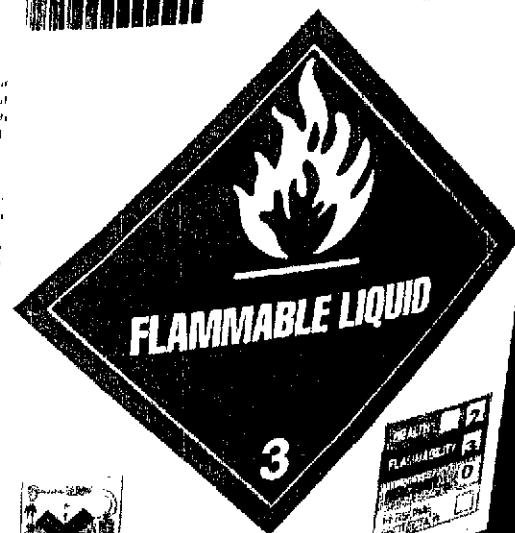


EMERGENCY ACTION

For help in a chemical emergency
 call CHEMTREC (800) 424-9300
 or Int. 1-703-527-3887

Resin Solution, 3

UN 1866



GPC POLYMERS
 15201 Grand Ave. Columbus, OH 43219
 Z3418







STAFF EXHIBIT 7

Civil Forfeiture Violations Chart
Nature & Gravity Points

10 points	Leaking Container Violations
10	Package integrity failure Package valves and closures not securely closed
6-8 points	Packaging, Segregation, & Handling Violations
8	Segregation & Loading Non-specification or non-performance packaging HM Vehicle attendance Relative motion among HM packages Over 5% outage in propane home storage tank in transportation
6	Specification/performance packaging does not meet req. (CT Double bulkhead drain/vent plugged 3 Pts) Bulk package weight or temperature exceeds that allowed by specification Packaging qualification and maintenance violations – CT test marking not displayed or CT tests not completed (Cargo Tanks: 6 points for first test/insp. Not Conducted OR DISPLAYED; +1 extent for each additional cargo tank Test/inspection not conducted OR DISPLAYED) LPG Cargo Tank handheld remote shutoff inoperable Violation of PHSMA Special Permit requirements CT manual remote shutoff inoperable Fail to have a HM Safety Permit on file as required. HM Training Not As Required (-2 extent for each completed, ie. Awareness)
6 points	Hazard Communication Violations
6	Proper HM placards not offered/affixed (+6 for each additional hazard class missing) (1 not affixed=NAV, +1 extent for each additional) Proper HM markings not offered/affixed (+6 for each additional hazard class missing) (1 not affixed=NAV, +1 extent for each additional) No proper HM shipping paper (+1 extent 172.203 violations for PIH, DWW; +3 For each technical names per 172.203 (c) or (k) **each element worth 1 point **If 1 element missing = NAV Packages offered/accepted without proper HM markings (+1 for required additional info)

Packages offered/accepted without proper HM labels
(+6 for subsidiary hazard class)
Hazardous waste manifest not as required
Misrepresenting hazmat present on vehicle

4 Points Hazardous Material Handling Violations

- 4 Failure to secure packages (no movement)

3 Points Hazardous Communications Violations

- 3 HM shipping papers – no technical names per 172.203 (c) or (k)
HM Marking – no technical name
Emergency response information (Subpart G) not as required
 ** No Written ER info
 ** No telephone no.
No emergency marking on CT emergency remote shutoff
Package not marked with special permit number when required
No emergency discharge procedure with LPG CT
Fail to maintain a copy of the HM safety Permit on the vehicle when required

2 Points Hazardous Communications Violations

- 2 Displaying a sign (drive safely, ect.) that could be confused with a Placard, as per 172.502 –NAV if only 1

3 Points Shipping Paper/ER Information Accessibility

- 3 Shipping papers/ER information not accessible
HM shipping papers not tabbed or first
HM entries not distinguished

0 Points Minor Hazard Communication Violations

- 0 Placard/markings/labeling visibility & display
No ltr. Qty, RQ, DOT-SP on shipping papers
Unauthorized abbreviation used in proper shipping name
Tech. Name not in association with proper shipping name – (out of sequence, not in parenthesis)
Minor shipping description sequence
“UN” instead of “NA”
Minor typographical errors
One placard visibility & display
CT Part 180 marking not properly placed

1-5 Points FMCSR Handling Violations

- 5 No route plan for radioactive materials or explosives
No emergency plan for radioactive materials
- 4 Failure to comply with local routing requirements
Locking devices on an intermodal container not secure while transporting hazardous materials
Non-English speaking driver
- 2 Railroad grade crossing violations – Only cite carrier for 2nd RR violation within a 24 month period. Issue NAV for first violation.
- 1 Failure to comply with local or state laws

2-3 Points FMCSR Violations (Must meet specific CVSA OOS Criteria)

- 3 Inoperative brake OOS
Hours of service violation
Ill or fatigued driver
Unauthorized passenger
Failure to have proper Commercial Drivers License
– Includes improper class, endorsement or operating in violation of restriction or in violation of learners permit
- 2 Slider handle assembly-Pin OOS; missing/broken OOS
5th wheel OOS Violation
Frame stress cracks OOS
Air brakes system (reserve pressure loss) OOS
- 1 Brake/Pushrod adjustment or defective brakes
If 20% of brakes out of adjustment or defective = 1 point violation
If > 20 % out of adjust., +1 extent for each full brake out of adjust or defective.
Broken leaf spring or spring hanger OOS
Defective air suspension system - OOS
Inoperative low air warning device OOS violation
- 0 Driver Smoking
Log Book Violations – form & manner only

0-1 Points FMCSR Violations (Must be 2 or more OOS Violations) –

- 1 Brake pad violations OOS
Cracked wheel/tire rim OOS
Other OOS Suspension Violations

Cut tire OOS
Worn tire, cord showing, OOS Violation, 4/32" & 2/32"
Lug nuts missing, OOS violation

- 0 Stoplights out OOS
- Emergency brake inoperable
- Improperly attached cargo tank appurtenance
- No emergency equipment
- Failure to carry Part 397 on vehicle placarded Class 1
- Flat tire, OOS violation
- Leaking tire OOS violation
- Blocking and bracing of non-HM

1-4 points FMCSR Driver Violations

- 4 Failure to stop at check point
- Driving after consumption of alcohol or controlled substance
- Driving while disqualified
- Failure to stop at railroad grade crossing
- 3 Improperly parked HM vehicle
- Possession of alcohol or controlled substance upon a CMV
- 1 No log book OOS
- Falsification of log book OOS
- Late log book OOS
- No or improper commercial driver's license –
- Driver smoking
- Seat belt violation
- Radar detector in use/possession
- Unauthorized passenger

ADDITIONAL ASSESSMENTS

Insurance violation	\$500.00 - C
Scope & Authority violation	\$500.00 - C
Avoiding or Bypass inspection	\$500.00 - D
Uniform HM Permit violation	\$500.00 - C
Uniform HW Permit violation	\$1,000.00 - C
Driving after being placed out of service	\$1,000.00 - D
Unified Carrier Registration (UCR)	\$500.00 - C
390.35 FALSE RECORD	\$1,000.00-C (D where appropriate)

Chart Effective Date: On Inspection Occurring After May 1, 2011

MATERIAL HAZARD CHART

<u>POINTS</u>	<u>HAZARD CLASS/DIV.</u>
1.5	1.1 2.3 6.1 7 Any PIH
1.3	1.2 1.3 4.3
1.1	2.1 3 4.1 4.2
0.9	5.1 5.2 8
0.7	1.4 1.5
0.5	1.6 2.2 PGIII (Combustible Liq.) 6.2 9 ORM-D

Point Modifiers

PGI = + .3

PGII = 0.0

PGIII = - .3

Hazardous Waste = +.1

Hazardous Substance = + .1

MARPOL = + .1

HAZARDOUS AMOUNT CHART

<u>POINTS</u>	<u>AMOUNT (WEIGHT)</u> Pounds/Kilograms
1.0	35,000+ lbs 15,876+ kg (Cargo Tank w/flammable – Class 3 & 2.1)
0.6	10,000 – 34,999 lb. 4,536 – 15,875 kg
0.4	1,000 – 9,999 lb. 454 – 4,535 kg
0.2	<1,000 lb < 454 kg Residue (Not Flammable)
Less	
0.1	If package < 100 lb./45 kg
0.2	If package < 5 lb./2 kg



**Public Utilities
Commission**

John R. Kasich, Governor
Todd A. Snitchler, Chairman

Commissioners

Paul A. Centotella
Cheryl Roberto
Steven D. Lesser
Andre T. Porter

June 23, 2011

9436300386S
OPC POLYMERS
1920 LEONARD AVE
COLUMBUS, OH 43219

RE: NOTICE OF APPARENT VIOLATION
AND INTENT TO ASSESS FORFEITURE
Case No. 9436300386S

Dear Sir or Madame:

On June 9, 2011, a vehicle operated by USF GLEN MOORE INC, was inspected within the State of Ohio by staff of the Transportation Department of the Public Utilities Commission of Ohio. As the result of discovery of the following apparent violation, of rule 4901:2-5-02, O.A.C., the Commission intends to make a civil monetary assessment against OPC POLYMERS in the following amount:

CODE	UNIT	VIOLATION	FORFEITURE
173.30	2	Loading/unloading transport vehicles	\$ 840.00

Within 30 days, you must pay the forfeiture or send a written request for conference. Failure to pay the forfeiture or send a written request for a conference within 30 days will result in this forfeiture amount being referred to the Attorney General's office for collection, and may adversely affect your authority with the Public Utilities Commission of Ohio.

Please review the enclosed information concerning this notice.

Sincerely,
Jonathan Frye, Chief
Compliance Division
Public Utilities Commission of Ohio
614-466-0351

TP

STAFF EXHIBIT 10



**Public Utilities
Commission**

John R. Kasich, Governor
Todd A. Snitchler, Chairman

Commissioners

Paul J. Centella
Charles B. Bero
Steven D. Deisser
Andre J. Porter

September 6, 2011

John Gerhold
Vice President OPC POLYMERS
1920 Leonard Ave
Columbus, OH 43219

RE: NOTICE OF PRELIMINARY DETERMINATION

Case No. 9436300386S

Officer:

Dear Sir or Madame:

On June 9, 2011, a vehicle operated by USF GLEN MOOR and driven by ANTHONY HOLMES, was inspected within the State of Ohio. As the result of discovery of the following apparent violation the Staff timely notified Respondent pursuant to Rule 4901:2-7-07, O.A.C., that it intended to make a civil monetary assessment against Respondent in the following amount:

Code	Violation	
173.30	Loading/unloading transport vehicles	\$ 840.00

Total Forfeiture Assessed :

A conference was conducted pursuant to Rule 4901:2-7-10(B), O.A.C., at which the Respondent had a full opportunity to present any reasons why the violation did not occur as alleged, mitigating circumstances regarding the amount of any forfeiture, and any other information relevant to the action proposed to be taken by Staff.

(continued)

STAFF EXHIBIT 11



Public Utilities Commission

John R. Kasich, Governor
John R. Kasich, Governor
Todd A. Schuchler, Chairman

Commissioners

Paul A. Centorella
Paul A. Centorella
Cheryl Roberto
Cheryl Roberto
Steven D. Lesser
Steven D. Lesser
Andre T. Porter
Andre T. Porter

September 6, 2011
John Gerhold
Vice President OPC POLYMERS
9436300386S

PAGE -2

As a result of the conference, Staff has made a Preliminary Determination that the Commission should make a civil monetary assessment against OPC POLYMERS in the following forfeiture:

Code	Violation	
173.30	Loading/unloading transport vehicles	\$ 840.00

Total Forfeiture Agreed :

Please include a certified check or money order for the N.P.D. forfeiture total, made payable to "Treasurer State of Ohio," and mail to: PUCO FISCAL, 180 E. Broad St, 4th floor, Cols. OH 43215-3793. FOR PROPER CREDIT, BE SURE TO PUT THE CASE NUMBER ON THE FACE OF THE CHECK.

Please consult the enclosed additional information concerning this Notice of Preliminary Determination.

Robert E. Marvin, Director
Transportation Department
Public Utilities Commission of Ohio



Public Utilities
Commission

John R. Kasich, Governor
Todd A. Snitchler, Chairman

Commissioners

Paul A. Centolella
Cheryl Roberto
Steven D. Lesser
Andre T. Porter

June 23, 2011

9436300386C
USF GLEN MOORE INC
1711 SHEARER DRIVE
CARLISLE, PA 17013-0760

RE: NOTICE OF APPARENT VIOLATION
AND INTENT TO ASSESS FORFEITURE
Case No. 9436300386C

Dear Sir or Madame:

On June 9, 2011, vehicle numbers 3216 (UNIT #1), 7120 (UNIT #2), operated by USF GLEN MOORE INC, and driven by ANTHONY HOLMES were inspected within the State of Ohio by staff of the Transportation Department of the Public Utilities Commission of Ohio. As the result of discovery of the following apparent violation, of rule 4901:2-5-02, O.A.C., the Commission intends to make a civil monetary assessment against USF GLEN MOORE INC in the following amount:

CODE	UNIT	VIOLATION	FORFEITURE
177.834A	2	Package not secure in vehicle - no secureme	\$ 840.00

Within 30 days, you must pay the forfeiture or send a written request for conference. Failure to pay the forfeiture or send a written request for a conference within 30 days will result in this forfeiture amount being referred to the Attorney General's office for collection, and may adversely affect your authority with the Public Utilities Commission of Ohio.

Please review the enclosed information concerning this notice.

Sincerely,
Jonathan Frye, Chief
Compliance Division
Public Utilities Commission of Ohio
614-466-0351

TP





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

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

APR 18 1991

Ms. Jeanette White, Manager
Hazardous Materials Compliance
BASF Corporation
100 Cherry Hill Road
Parsippany, NJ 07054

Dear Ms. White:

This is in response to your letter requesting clarification of the regulatory responsibilities for loading and securing hazardous materials shipments under 49 CFR 177.834. I apologize for the delay in responding and regret any inconvenience it may have caused.

As stated in § 171.2 of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180), no person may offer or accept a hazardous material for transportation in commerce unless the material is properly classed, described, packaged, marked, labeled and in condition for shipment as required or authorized by this subchapter. When a person performs a function prescribed by the HMR, the person must perform that function in compliance with the applicable requirements of the HMR. In a situation where, pursuant to business arrangements, a shipper loads hazardous materials and a carrier secures the load, both the shipper and carrier are responsible for the functions they perform and either, or both, may be held responsible for not fulfilling those requirements.

I trust this answers your inquiry. If we can be of further assistance, please do not hesitate to contact us.

Sincerely,

Edward T. Mazzullo
Director, Office of Hazardous
Materials Standards

*6/6/92
H.P. 100-1*



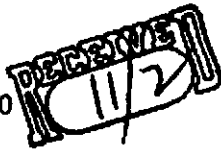
BASF Corporation

BASF

DB

75/172831
SC: 399,40

October 30, 1990



Mr. Ed Mazzullo, Director
OHMT Standards Division
RSPA - DOT
407th Street SW
Washington, D.C. 20590-0001

Dear Mr. Mazzullo:

Please provide us with an interpretation of who, shipper or carrier, is in violation of the HMR in the following circumstances.

Shipper and carrier established a procedure several years ago which they have followed consistently, even though this procedure was not in the form of a written contract. The procedure is that the shipper loads its product and the carrier then secures the load.

Recently the shipper was cited by DOT because the load was not secured properly.

According to the formal interpretation - Notice 90-2, dated 2-26-90:

"The key issue in determining the regulatory responsibilities under the requirements in Parts 171, 172, and 173 is determining which parties perform which functions. This involves a case-by-case determination based upon all relevant facts."

Each person is responsible for compliance with the hazardous materials regulations with respect to the functions that he performs. It is possible for a single movement to have a person who loads the shipment and a different person who secures the load.

A violation occurs when a function required under the HMR is either not performed at all or is improperly performed. In cases of nonperformance, it is necessary to take a look at the procedure established between various persons to determine which of them accepted responsibility for securing the load.

It is our position that the shipper performed the function that he performs, namely, loading the product. The carrier, however, did not perform the function he performs, namely, securing the load. Consequently, the carrier, not the shipper was in violation of the regulations.

665 2
G.P. 1. cf. 2

Thank you in advance for your cooperation. If at all possible, we would like to have your reply by the end of November.

Sincerely,

Jeanette White
Jeanette White, Manager
Hazardous Materials Compliance

cc: CENuti
CRussell

665-2
47 2 of 2



DOT Training
11/28/11
Safex

DOT TRAINING



Course Objectives

- You will understand how DOT regulations relate to your specific job function by participating in discussions and passing an examination.
- You will be able to determine the proper shipping name, labels, markings and placards by completing exercises.
- You will know how to properly handle a spill by utilizing the Emergency Response Guidebook and completing an exercise.

HMTA Overview



PHMSA's mission is to protect people, property and the environment from the risks inherent in transportation of hazardous materials - by pipeline and other modes of transportation (<http://www.phmsa.dot.gov/hazmat>).

RESPONDENT'S
EXHIBIT

3

ALL-STATE LEGAL SUPPLY CO.

HMTA Overview

- Applies to all transportation modes: by rail, water, air, and to interstate and foreign carriers by

- Rail
- Water
- Air
- Interstate and foreign carriers by motor vehicle



Training Requirements

- Frequency
 - Within 90 days of employment
 - Change in job function
 - Refresher every 3 years
- Content to include:
 - General awareness
 - Function specific
 - Safety
 - Security (if applicable)



Training Requirements

- General Awareness
 - Recognize and identify hazardous materials
- Function Specific
 - DOT requirements for the employee's job task(s) that affect the transportation of a hazardous material
 - Marking, labeling, packaging, loading, unloading, filling out paperwork, etc.



Training Requirements

- Safety Training
 - Emergency response information
 - Measures to protect individual
 - Methods/Procedures to avoid accident
- Security
 - Based on companies security plan required by HM232
- Records
 - Name of employee trained
 - Date of training
 - Description/copy of materials
 - Certification and test results
 - Must maintain for employment term plus 90 days



Hazardous Materials Security Plan Review

- Personnel Security
- Hazardous Materials Security
- En Route Security of Hazardous Materials



Security Plan Requirements (172.800)

- Any HC 7 (Radioactive)
- > 25 kg of HC 1.1-1.3
- > 1 L material poisonous by inhalation
- > 3500 gal of liquids/gases
- > 468 ft³ of solids
- Non-bulk shipments gross weight \geq 5000 lbs
- Agent or Toxin regulated by CDC
- Best Practice for many companies

SECURITY PLAN COMPONENTS (49 CFR 172.802)

- Personnel security
 - Background checks; security clearances
- Hazardous Material Security
- En Route Security of Hazardous Materials
- Must Be in Writing & Retained as Long as In Effect
- Plans conforming to other regulations, standards, protocols and guidelines may as part of Federal agencies and international or industry organizations may be used to satisfy requirements.

DOT vs OSHA vs EPA

- DOT regulates "hazardous material" in transport by one of the modes listed for commerce
- OSHA regulates "hazardous chemicals" used in the workplace
- EPA regulates specific list of materials considered "hazardous wastes" and "hazardous substances"

Hazardous Material

DOT definition of a Hazardous Material:

- Hazardous substances
- Hazardous wastes (49 CFR 262)
- Marine pollutants (Appendix B)
- Any material that meets one of the nine hazard classes
- Material meeting criteria for hazard classes and divisions under Part 173
- Materials identified as hazardous in 172.101

17

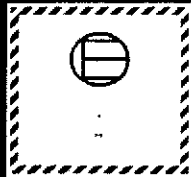
Hazardous Materials

- What Hazardous Materials are present at your facilities?

18

Small or "Excepted" Quantities

- Small quantities have less stringent regulations
- Package must say:
"This package conforms to 49 CFR 173.4" or
- ORM-D



19

Small QTY Limitations

- General (per inner receptacle)
 - 30 ml (1 ounce) liquids– except 6.1 PG I Hazard Zone A & B
 - 30 g (1 ounce) solids
 - UN Packaging (POPS)
 - Gross mass of completed PKG Cannot exceed 29 kg (64 pounds)

20

Excepted QTY Limitations

- + ■ General (per inner receptacle)
 - 30 ml (1 ounce) liquids— except 6.1 PG I Hazard Zone A & B
 - 30 g (1 ounce) solids
- **Aggregate Totals per Packing Group:**
 - PG I- 300 g (0.66#) solids, 300 ml (0.08 gal) liquids
 - PG II- 500 g (1.1#) solids, 500 g (0.1 gal) liquids
 - PG III- 1 kg (2.2#) solids, 1 L (0.2 gal) liquids

17

Materials of Trade Exceptions -

+ 49 CFR 173.6

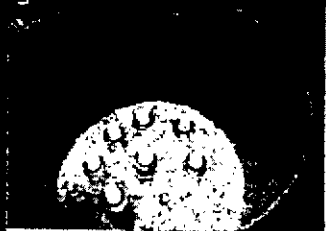
- When transported in by motor vehicle in conformance with this section, a material of trade is not subject to any other requirements of this subchapter besides those set forth or referenced in Section 173.6
- Painters, welders, medical suppliers, etc.



18

Lab Packs (173.12)

- + ■ What is a "lab pack"
 - Small containers of the same class of chemicals placed within one container for shipping to a TSDF.

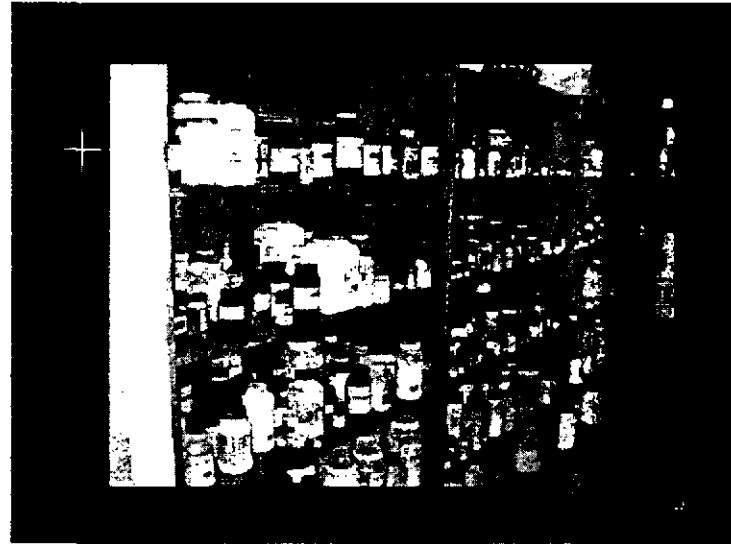


19

Lab Pack

- + ■ Purpose
 - Out of date chemicals
 - Contaminated products
 - Partially used
 - Leaking containers
 - Simply, no longer needed

20



Lab Packs

- Chemicals must be compatible with packaging material! (Segregation Table)
 - Glass, Metal, or Plastic
- If liquid, absorbent must be present
- UN Rated Package
- Gross weight cannot exceed 205 kg (452 lbs)

Hazardous Materials Table (HMT)

- Comprehensive table – section 172.101 – lists several thousand commonly transported hazardous materials and generic descriptions
- Includes OSHA's hazardous chemicals, EPA's hazardous wastes, and EPA's CERCLA list of hazardous substances
- Table provides the first steps of classifying a material for shipment

DOT Proper Shipping Name

- Includes the following in this order
 - Identification number (UN or NA)
 - Proper shipping name
 - Hazard classification
 - Packing group
- Proper sequence is important
 - Until 12/31/2012 can be SHIP or ISHP
 - After 2012 must be ISHP

75

Identification Numbers

- Each hazardous material has a 4-digit code that is preceded by UN or NA
- Those with NA are not recognized for international transportation except to and from Canada



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§172.101 Hazardous Materials Table

Sym-bols	Hazardous materials descriptions and proper shipping names	Hazard class or division	Identifica-tion Numbers	PG
(1)	(2)	(3)	(4)	(5)
	Acetaldehyde	3	UN1088	I
A	Acetaldehyde anhydrous	9	UN1841	III
	Acetaldehyde dimer	3	UN2332	III
	Acetic acid, glacial or Acetic acid solution, with more than 80 per-cent acid, by mass	8	UN2789	I
	Acetic acid solution, not less than 50 percent but not more than 80 per-cent acid, by mass	8	UN2790	II

Column 1 Symbols

- "A" denotes air shipment
- "D" denotes domestic shipment
 - Not appropriate for international shipments
- "I" denotes proper shipping name for international shipments
 - Alternates may be selected for domestic
- "W" denotes requirements for vessels
- "+" sign fixes proper shipping name, HC, and PG for that entry w/o regard to whether material meets the definition of that class, PG or any other HC definition.

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Proper Shipping Name – Column 2

- +
 - Must be the best descriptive name available from the Hazmat Table 172
 - Generic or n.o.s. descriptions
 - n.o.s. – “not otherwise specified”
 - If the appropriate technical name or product use is not shown in the table, a generic n.o.s. description may be used

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Proper Shipping Name Priority

- +
 - Specific chemical (acetone, toluene, etc.)
 - Product use (batteries, lithium batteries, paint, etc.)
 - Generic chemical n.o.s. (alcohols, aldehydes, ketones, etc.)
 - Hazard class n.o.s. (flammable liquids, corrosive liquids, toxic solids, etc.)

You Tell Me....???

- +
 - What is the proper shipping name (Column 2 only)?
 - Nitric acid
 - Potassium Hypochlorite
 - Bacardi 151 proof rum
 - isocyanate
 - 50:50 mixture of diesel fuel and water

30

Hazard Classifications

- +
 - Class 1** Explosives
 - Class 2** Gases
 - Class 3** Flammable & Combustible liquids
 - Class 4** Flammable Solids, Spontaneously Combustible, or Dangerous When Wet
 - Class 5** Oxidizers of Organic Peroxides
 - Class 6** Poisons
 - Class 7** Radioactive Materials
 - Class 8** Corrosives
 - Class 9** Miscellaneous Hazardous Materials

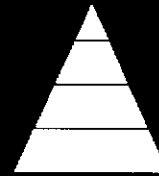
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- What Hazardous Materials are present at your facilities?

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Packing Group

- Packing group I Great Danger
- Packing group II Medium Danger
- Packing group III Minor Danger



Exceptions are ORM-D, hazard class 2, 7 and division 6.2

12

Precedence Table 49 CFR 173.2a

- Used to decide proper shipping name for mixtures of two or more generic hazard classes
 - 50% mixture of benzene (PG I) and sodium hydroxide (PG II)?
 - 50% mixture of diesel fuel (PG III) and potassium hydroxide (PG I)?

13

Packing Group Definitions – 173.115 (Class 1 – Class 9)

- Used to decide the packing groups for generic or hazard class entries in 172 table
 - A flammable liquid mixture with flash point of 80 °F and initial boiling point of 100 °F?
 - A Division 6.1 material with an LD₅₀ (oral) of 49 mg/kg?
 - A corrosive liquid that causes full thickness skin destruction of intact skin within an observation period of 60 minutes starting after an exposure time of 3 minutes?

14

Work Exercise

Determining DOT Proper Shipping Names

DOT PSN

Markings – 49 CFR 172.300

- Applies specific handling requirements to the outer packaging of a combination package, or outside of a single package/container



Labeling – 49 CFR 172.400

- Labeling must follow the primary hazard classification.
 - Subsidiary hazards need labels
- Label codes listed in table 172.101, Column 6

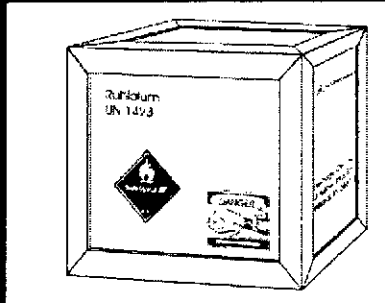


Hazardous Waste Labels

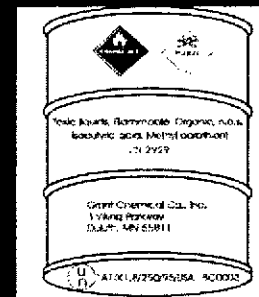


DOT Information

Proper Marking and Labeling



Proper Marking and Labeling



Determining Packaging

- Hazardous Materials Table (172.101) assists with determining packaging
- Column 8B and 8C (173.***)
 - Column 8A (Exceptions)
 - Column 7 (Special Provisions)
 - See 172.102
- Always look at general packaging provisions
 - 49 CFR 173.24



ID Codes for Non-Bulk Packaging Subpart L (49 CFR 178.500)

→ 1A1/X1.5/150/S/08/USA/RA

X = 9, 11, 111
Y = 11, 111
Z = 111

1 = Non-removable head
2 = Removable head


1 = Drum
2 = Wooden Barrel
3 = Jerrican
4 = Box
5 = Bag
6 = Composite Packaging
7 = Pressure Receptacle

A = Steel
B = Aluminum
C = Natural Wood
D = Plywood
F = Reconstituted Wood
G = Plastic
H = Fiberboard
L = Textile
M = Paper, Multi-Wall
N = Metal (other than steel or Al)
P = Glass, Porcelain, or Stoneware

DOT PSN

- Name and address, shipper's certification
- Hazardous materials must be entered first if mixed with non-regulated in contrasting color
- Must denote with "X" or RQ if applicable
- Must be legible in correct sequence as specified

DOT Proper Shipping Name

	HAZARDOUS MATERIALS	
	FDOT/REGULATED SHIPMENT NUMBER <div style="border: 1px solid black; padding: 5px; text-align: center;">1 2 3 4 5 6</div>	EMERGENCY CONTACT NUMBER <div style="border: 1px solid black; padding: 5px; text-align: center;">412-123-4567</div>
Material Name To Shipper: Complete all items From Shipper: Item 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 254, 255, 256, 257, 258, 259, 260, 261, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 276, 277, 278, 279, 280, 281, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 326, 327, 328, 329, 330, 331, 332, 333, 334, 335, 336, 337, 338, 339, 340, 341, 342, 343, 344, 345, 346, 347, 348, 349, 350, 351, 352, 353, 354, 355, 356, 357, 358, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 370, 371, 372, 373, 374, 375, 376, 377, 378, 379, 380, 381, 382, 383, 384, 385, 386, 387, 388, 389, 390, 391, 392, 393, 394, 395, 396, 397, 398, 399, 400, 401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 411, 412, 413, 414, 415, 416, 417, 418, 419, 420, 421, 422, 423, 424, 425, 426, 427, 428, 429, 430, 431, 432, 433, 434, 435, 436, 437, 438, 439, 440, 441, 442, 443, 444, 445, 446, 447, 448, 449, 450, 451, 452, 453, 454, 455, 456, 457, 458, 459, 460, 461, 462, 463, 464, 465, 466, 467, 468, 469, 470, 471, 472, 473, 474, 475, 476, 477, 478, 479, 480, 481, 482, 483, 484, 485, 486, 487, 488, 489, 490, 491, 492, 493, 494, 495, 496, 497, 498, 499, 500, 501, 502, 503, 504, 505, 506, 507, 508, 509, 510, 511, 512, 513, 514, 515, 516, 517, 518, 519, 520, 521, 522, 523, 524, 525, 526, 527, 528, 529, 530, 531, 532, 533, 534, 535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 569, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 682, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 703, 704, 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 723, 724, 725, 726, 727, 728, 729, 730, 731, 732, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 773, 774, 775, 776, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 79		

HM Box

DOT Proper Shipping Name

Uniform Hazardous Waste Manifest

Placarding – 49 CFR 172.500

- Shippers responsibility to make sure shipment is placarded
- Does not apply to:
 - Infectious substances
 - ORM-D
 - Limited Quantity
 - Hazardous materials prepared per 173.13
 - Hazardous materials prepared per 173.4
 - Combustible liquids in non-bulk packages
- Prohibited and permissive placarding (49 CFR 172.502)

Placarding – 49 CFR 172.500

- General placarding requirements (49 CFR 172.504)
 -
 - Two or more hazardous categories requiring different placards
 - Except when 1000 kg (2,205 lbs.) aggregate gross weight or more of one category (Table 2)

Segregation and Separation Chart of Hazardous Materials – 49 CFR 177.848

- Materials that meet one or more of hazard classes
- Packages requiring labels per 49 CFR 172
- Compartment within a multi-compartmented cargo tank subject to restrictions (49 CFR 173.33)
- Portable tank loaded in a transport vehicle or freight container
 -
- Cyanides or cyanide mixtures may not be stored, loaded, or transported with acids
- Division 4.2 may not be stored, loaded, or transported with Class 8 materials

Emergency Response Information

- Must be available at all times when hazardous material is present
- Emergency response information is information which can be used in the event of an incident

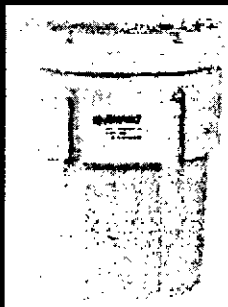


Emergency Response Information

- Immediate health hazards
- Risks of fire/explosion
- Immediate precautions
- Initial methods for handling spills/leaks
- First aid measures



Salvage Drum, when would you need one?



Emergency Response Guidebook



Emergency Response Guidebook Exercises

- + ■ What is UN1017?
- What is UN1005?
- What is UN1993?
- What is the UN # for acetone?
- What is the UN# for lithium batteries
- What is the UN # paint related materials
- What is the UN # for hazardous waste liquid?
- What is the UN# for hazardous waste solid?

Emergency Response Guidebook Exercises

- + ■ What is the initial isolation distance for a large spill of fuming nitric acid?
- How far should we protect downwind at night? **Why?**
- What is the ERG number for a Class 3 liquid & Class 8 liquid?
- What is the ERG number for a DOT412 corrosive tanker truck?

When To Report an Incident



- + ■ Fatality
- Hospitalization
- Property damage >\$50,000
- Public evacuation of 1 hour or more
- Aircraft flight pattern is altered
- Radioactive or etiologic spill
- Requires telephone notification to National Response Center
- Followed by written report on DOT Form 5800.1 within 30 days

Registration Application

- + ■ Must register annually if you ship radioactive, explosive, or poisonous by inhalation materials
- Some bulk packaging are included
- Elevated temperatures and listed marine pollutant material require registration
- DOT Form 5800.2 completed by June 30th of each year along with fee



Summary

- Primary goal of DOT under HMTA is to ensure that hazardous materials are handled and transported safely
- Training requirements are designed to emphasize the proper ways to handle hazardous materials and communicate hazards of packages by marking, labeling, placarding, and descriptions

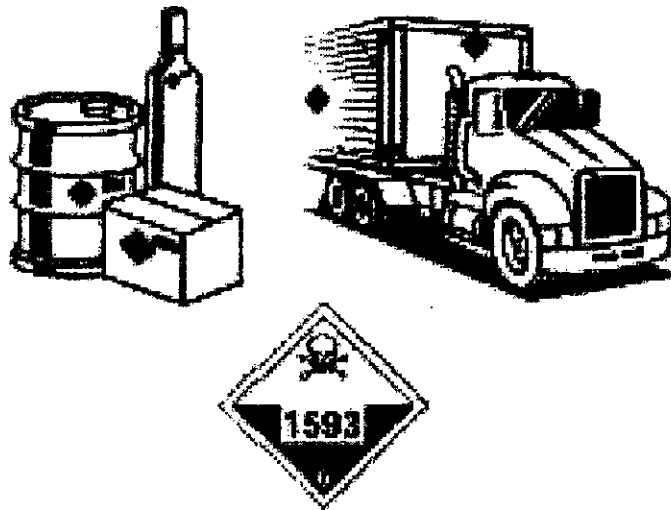
41

Any DOT Questions?



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DOT Refresher Training for Shipping Hazardous Materials



2009

Presented by

Safe



DOT Refresher Agenda

8:00 - 8:15 am	Student Introductions
8:15 - 8:45 am	Hazardous Materials Regulations (49 CFR) - Review Changes and/or Updates
8:45 - 9:45 am	Classification of Hazardous Materials including determining DOT proper shipping name
9:45 - 10:15 am	Marking and Labeling Hazardous Material Packages
10:15 - 10:45 am	Selecting Packaging for Hazardous Material Shipments
10:45 - 11:15 pm	Selecting Packaging for Hazardous Material Shipments
11:15-11:45 pm	Placarding Requirements for Hazardous Material Shipments
11:45 - 12:15 pm	Emergency Response for Hazardous Materials Shipments (2008 ERG Guidebook)
12:15 - 1:00 pm	DOT Refresher Final Review

DOT Refresher Training

Presented by
Safex

[illegible]

Course Objectives

- You will understand how DOT regulations relate to your specific job function by participating in discussions
- You will be able to determine the proper shipping name, labels, markings and placards for a shipment of hazardous materials by accurately completing exercises.
- You will know how to properly handle a spill by utilizing the Emergency Response Guidebook and correctly completing an exercise.
- You will learn new regulatory updates and how they affect you through classroom discussion.

What's New with DOT?

- DOT issued Final Rule under HM-215J and HM-224D affecting international harmonization (January 14, 2009)
- Federal Register Volume 74, No. 9
- Docket Numbers PHMSA-2007-0065 (HM-224D) and PHMSA-2008-0005 (HM-215J)
- Includes amendments affecting the transportation of batteries and battery powered devices

[illegible]

[HMTA Overview]



PHMSA's mission is to protect people, property and the environment from the risks inherent in transportation of hazardous materials - by pipeline and other modes of transportation (<http://www.phmsa.dot.gov/hazmat>).

[HMTA Overview]

- Applies to all transportation modes:
 - Rail (174)
 - Water (176 or IMDG)
 - Air (175 or IATA)
 - Interstate and foreign carriers by motor vehicle (171 – 173)



[Training Requirements (Subpart H - 172.700)]

- Frequency
 - Within 90 days of employment
 - Change in job function
 - Refresher every 3 years
- Content to include:
 - General awareness
 - Function specific
 - Safety
 - Security (if applicable)



[SECURITY PLAN COMPONENTS (172.802)]

- Personnel security
 - Background checks; security clearances
- Hazardous Material Security
- En Route Security of Hazardous Materials
- Must Be in Writing & Retained as long as in effect
- Plans conforming to other regulations, standards, protocols and guidelines may as part of Federal agencies and international or industry organizations may be used to satisfy requirements.

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[DOT vs OSHA vs EPA]

- DOT regulates "hazardous material" in transport by one of the modes listed for commerce.
 - Internationally regulated as Dangerous Goods
- OSHA regulates "hazardous chemicals" used in the workplace
- EPA regulates specific list of materials considered "hazardous wastes" and "hazardous substances"

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[Hazardous Material]

DOT definition (171.8):

- Hazardous substances (Appendix A or > RQ for 1 package)
- Hazardous wastes (40 CFR 262)
- Marine pollutants (Appendix B)
- Any material that meets one of the nine DOT hazard classes

18

[DOT Proper Shipping Name]

- Includes the following in this order
 - Identification number (UN or NA)
 - Proper shipping name
 - Hazard classification
 - Packing group
- Proper sequence
 - Until 2010 can be SHIP or ISHP
 - After 2010 must be ISHP

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§172.101 Hazardous Materials Table				
Symbol	Hazardous materials descriptions and proper shipping names	Hazard class or division	Identification Numbers	PG
(1)	(2)	(3)	(4)	(5)
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A	Acetaldehyde anhydrous	9	UN1841	III
	Acetaldehyde oxime	3	UN2332	III
	Acetic acid, glacial or Acetic acid solution, with more than 80 percent acid, by mass	8	UN2789	II
	Acetic acid solution, not less than 50 percent but not more than 80 percent acid, by mass	8	UN2790	II

[Column 1 Symbols]

- "A" denotes air shipment
- "D" denotes domestic shipment
 - Not appropriate for international shipments
- "I" denotes proper shipping name for international shipments
 - Alternates may be selected for domestic
- "W" denotes requirements for vessels
- "+" sign fixes proper shipping name, HC, and PG for that entry w/o regard to whether material meets the definition of that class, PG or any other HC definition.

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[Hazard Classifications – Column 3]

- Class 1** Explosives
- Class 2** Gases
- Class 3** Flammable & Combustible liquids
- Class 4** Flammable Solids, Spontaneously Combustible, or Dangerous When Wet
- Class 5** Oxidizers of Organic Peroxides
- Class 6** Poisons
- Class 7** Radioactive Materials
- Class 8** Corrosives
- Class 9** Miscellaneous Hazardous Materials

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[Identification Numbers – Column 4]

- Each hazardous material has a 4-digit code that is preceded by UN or NA
- Those with NA are not recognized for international transportation except to and from Canada



29

[Packing Group – Column 5]

- Packing group I Great Danger
- Packing group II Medium Danger
- Packing group III Minor Danger



30

[Markings – 172.300]

- Applies specific handling requirements to the outer packaging of a combination package, or outside of a single package/container



34

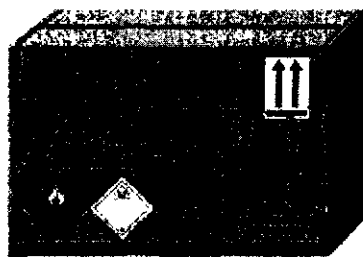
[Labeling – 172.400]

- Labeling must follow the primary hazard classification.
 - Subsidiary hazards need labels
- Label codes listed in table 172.101, Column 6



35

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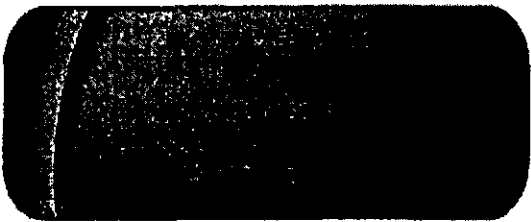


Markings

Labels

36

[What type of container do I use?]



UN1A2/Y1.5/150/96 and UN1A2/X150S

[ID Codes for Non-Bulk Packaging Subpart L (178.500)]

1A1/X1.5/150/S/08/USA/RA

1 = Non-removable head
2 = Removable head

1 = Drum
2 = Wooden Barrel
3 = Jerrican
4 = Box
5 = Bag
6 = Composite Packaging
7 = Pressure Receptacle

A = Steel
B = Aluminum
C = Natural Wood
D = Plywood
F = Reconstituted Wood
H = Plastic
L = Textile
M = Paper, Multi-Wall
N = Metal (other than steel or Al)
P = Glass, Porcelain, or Stoneware

X = I, R, III
Y = II, III
Z = III

[Selecting Packaging]

■ Is the following packaging correct?

- Acetone, 3, UN 1090, II packaged in a 5-gallon UN1A1 steel drum.
- A one-gallon plastic container of 100% formic acid, 8, UN1779, II inside a UN4G specification fiberboard box weighing 50 pounds.
- Two five-gallon metal cans of paint, 3, UN 1263, PG III, packed in a strong fiberboard box.
- A 55 gallon steel drum, UN1A1, of Corrosive, solid, n.o.s., 8, UN 1759, PG I

FedEx

HAZARDOUS MATERIALS

EMERGENCY CONTRACT NUMBER: 412-123-4567

123456

1 fiberboard box; chloroform

6.1 UN 1898

32 oz. This package conforms to 49CFR 173.13

OP-900

FedEx

HAZARDOUS MATERIALS

EMERGENCY CONTRACT NUMBER: 412-123-4567

123456

1 fiberboard box; toxic, liquids, organic, n.o.s. (diethylglycol)

6.1 UN 2810

18 oz. DOT-E-8168

OP-900

- When shipments are prepared under a DOT special permit, all shipping forms must reflect the appropriate DOT-SP number.

HM Box

DOT Proper Shipping Name

Uniform Hazardous Waste Manifest

]

55

I

- 

4

[illegible]

J

-

4

[Salvage Drum, when would you need one?]



[Spill kit, where would you have one?]

- Who is responsible for the spill kit?
 - Inspections
 - Blockings



[Emergency Response Guidebook]



[Registration Application]

- Must register annually if you ship radioactive, explosive, or poisonous by inhalation materials
- Some bulk packaging are included
- Elevated temperatures and listed marine pollutant material require registration
- DOT Form 5800.2 completed by June 30th of each year along with fee. Fee is scheduled to go from about \$500 to \$2500.

41

[Any Questions?]



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How to Comply with Federal Hazardous Materials Regulations

This document provides only a general overview of the requirements for transporting hazardous materials by highway.

For more specific requirements, carriers and shippers should consult the most current edition of 49 CFR Parts 100-185. Motor carriers should also consult the Federal Motor Carrier Safety Regulations.

Related Links
HM Safety

TABLE OF CONTENTS

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OVERVIEW

The Secretary of the Department of Transportation receives the authority to regulate the transportation of hazardous materials from the Hazardous Materials Transportation Act (HMTA), as amended and codified in 49 U.S.C. 5101 et seq. The Secretary is authorized to issue regulations to implement the requirements of 49 U.S.C. The Pipeline and Hazardous Materials Safety Administration (PHMSA) (formerly the Research and Special Provisions Administration (RSPA)) was delegated the responsibility to write the hazardous materials regulations, which are contained in 49 CFR Parts 100-180. In order to accomplish his responsibilities under the HMTA the Secretary "...may authorize any officer, employee, or agent to enter upon inspect, and examine, at reasonable times and in a reasonable manner, the records and properties of persons to the extent such records and properties relate to: (1) the manufacture, fabrication, marking, maintenance, reconditioning, repair, testing, or distribution of packages or containers for use by any "person" in the transportation of hazardous materials in commerce; or (2) the transportation or shipment by any "person" of hazardous materials in "commerce."

The hazardous materials regulations have changed significantly over the last several years. These changes were first introduced in Docket HM-181 which provided for the harmonization of the United States hazardous materials regulations with international standards in order to facilitate foreign trade and maintain the competitiveness of U.S. goods.

The applicability of the hazardous materials regulations was extended to all intrastate shipments of hazardous materials by highway effective October 1, 1998, as published in the final rule, Docket HM-200 dated January 8, 1997. This final rule also provided exceptions for "materials of trade", "agricultural operations" and certain non-specification packaging used in commerce.

Special agents of the Department of Transportation can not be denied reasonable access to those areas that fall within the official scope of their duties. The Secretary has delegated this authority to the Federal Aviation Administration (FAA), Federal Motor Carrier Safety Administration (FMCSA), Federal Railway Administration (FRA), Pipeline and Hazardous Materials Safety Administration (PHMSA), and the United States Coast Guard (USCG).

The Government Printing Office has made the Federal Register and 49 CFR available on the Internet. The Web site for the Federal Register is <http://www.gpoaccess.gov/fr/index.html>. The Web site address for 49 CFR is <http://www.gpoaccess.gov/cfr/index.html>. Clarifications of the requirements contained in the Federal Hazardous Materials Regulations and the Motor Carrier Safety Regulations may be found at <http://www.fmcsa.dot.gov/rulesregs/fmcsrhome.htm>.

APPLICABILITY

The hazardous materials regulations are applicable to the transportation of hazardous materials in commerce and their offering to:

1. Interstate, intrastate, and foreign carriers by rail car, aircraft, motor vehicle and vessel.
2. The representation that a hazardous material is present in a package, container, rail car, aircraft, motor vehicle or vessel.
3. The manufacture, fabrication, marking, maintenance, reconditioning, repairing or testing of a package or container which is represented, marked, certified or sold for use in the transportation of hazardous materials (49 CFR 171.1(a))

GENERAL DOT HAZARDOUS MATERIALS REGULATORY REQUIREMENTS

"No person may offer or accept a hazardous material for transportation in commerce unless that person is registered in conformance with subpart G of Part 107 of this chapter, if applicable, and the hazardous material is properly classed, described, packaged, marked, labeled, and in condition for shipment as required or authorized..."(49 CFR 171.2(a))

Underlined in the preceding extract from the Hazardous Materials Regulations are three important terms; "person," "offeror" and "commerce" (See Appendix A Definitions). The word shipper is frequently used by industry in place of the word "offeror." For the purpose of this document only, the term shipper and "offeror" are used interchangeably. These three words are important in that they define when you are subject to the jurisdiction of the Department of Transportation. Additionally, you may be subject to the requirements of other Federal and/or State Laws.

FEDERAL GOVERNMENT AND GOVERNMENT CONTRACTORS

Most Federal Agencies including the Department of Defense are considered "offerors" when they ship hazardous materials by commercial carriers. In those rare instances where governmental agencies transport hazardous materials in commerce on government vehicles/aircraft, the agency is also considered a carrier. Contractors are fully subject to the requirements of the Federal hazardous materials transportation law.

The Uniformed Services of the United States generally are not subject to the commerce clause of the Constitution. Therefore, military shipments, transported on military vehicles or aircraft are not subject to Federal jurisdiction. However, many states require

**RESPONDENT'S
EXHIBIT**

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military movements by highway to conform to 49 CFR or compatible state regulations. DOD and Service Regulations also require compliance with 49 CFR Parts 100-180. When in peacetime, the military services procure commercial transportation, (offering into commerce), the military is engaged in commerce and required to comply with 49 CFR

HM REGISTRATION

"Persons" who offer for transportation, or transport in foreign, interstate or intrastate commerce: (a) any highway route controlled quantity of a Class 7 (radioactive) material; (b) more than 25 kg (55 lbs.) of a Division 1.1, 1.2, or 1.3 (explosive) material in a motor vehicle, rail car or freight container; (c) more than 1 L per package of a material extremely poisonous by inhalation; (d) a hazardous material in a bulk packaging having a capacity of 3,500 gals. for liquids or gases, or more than 468 cubic feet for solids; (e) a shipment in other than bulk packaging of 5,000 lbs. gross weight or more of one class of hazardous material for which the transport vehicle requires placarding; (f) any quantity of materials requiring placarding. The following are excepted from the registration requirement:

1. An agency of the Federal Government
2. A State Agency
3. An agency or political subdivision of a State
4. An employee of (1)-(3)
5. A hazmat employee (including an owner operator of a motor vehicle leased to a registered motor carrier for 30 days or more).
6. A person domiciled outside the United States who offers HM solely from outside the United States. (See 49 CFR 107.606(a) (8) for exceptions and reciprocity.)
7. Registration is required annually and includes a fee. For additional information on the registration requirement, you may call 1-800-467-4922 or (202) 366-4109.

HM PERMITTING - 49 CFR 385.400

After January 1, 2005, the Federal Motor Carrier Safety Administration (FMCSA) requires motor carriers to obtain a Hazardous Materials Safety Permit (HMSP) prior to transporting certain highly hazardous materials. An HMSP is required to transport any of the following materials:

1. A highway route-controlled quantity of a Class 7 (radioactive) material;
2. More than 25 kg (55 pounds) of a Division 1.1, 1.2, or 1.3 (explosive) material or an amount of a Division 1.5 (explosive) material requiring placarding under 49 CFR 172;
3. More than one liter (1.08 quarts) per package of a "material poisonous by inhalation," that meets the criteria for "hazard zone A";
4. A "material poisonous by inhalation," that meets the criteria for "hazard zone B," in a bulk packaging (capacity greater than 460 L (119 gallons));
5. A "material poisonous by inhalation," that meets the criteria for "hazard zone C," or "hazard zone D," in a packaging having a capacity equal to or greater than 13,248 L (3,500 gallons); or
6. A shipment of compressed or refrigerated liquefied methane or liquefied natural gas, or other liquefied gas with a methane content of at least 85 percent, in a bulk packaging having a capacity equal to or greater than 13,248 L (3,500 gallons).

Motor carriers will be required to apply for a HMSP the next time they are scheduled to file the MCS-150 form after January 1, 2005. All motor carriers, including interstate, intrastate and foreign carriers must comply with this regulation. For more information you may call 202-366-6121.

ENFORCEMENT

The Modal Agencies have established their own programs to prioritize their inspection activities of transporters of hazardous materials. Pipeline and Hazardous Materials Safety Administration, in addition to the Modal Agencies have selection criteria for shippers: "offerors", that are similar i.e. (1) Investigation of known shipper violations discovered during carrier audits, (2) Non-frivolous written complaints alleging violations of the Federal Hazardous Materials Regulations, (3) NRC and DOT 5800.1, spill and hazmat incident reports, (4) Referrals from other governmental agencies and special investigations targeting high risk hazardous materials such as explosives and certain radioactive materials. In almost all instances these shipper inspections are unannounced.

In the event that inspection of your hazardous materials operations discloses violations of the hazardous materials regulations, you may be subject to civil and/or criminal penalties.

PENALTIES PER VIOLATION 107.329

CIVIL	MINIMUM	\$275.00
	MAXIMUM	\$32,500.00
CRIMINAL*	INDIVIDUAL	\$250,000.00
	CORPORATION	\$500,000.00

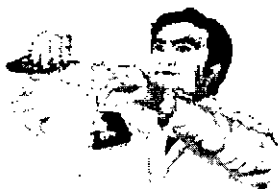
* (Levels of fine from 18 U.S.C. and includes provision for imprisonment for not more than 5 years.)

Although the Federal Government is exempt from the penalty provisions, (See definition of "person" on page 26 of this H.O.) employees of the federal government are not exempt under the HMTA.

HAZARDOUS MATERIALS SHIPPER RESPONSIBILITIES

<p>DETERMINE WHETHER A MATERIAL MEETS THE DEFINITION OF A "HAZARDOUS MATERIAL"</p> <p>PROPER SHIPPING NAME</p> <p>CLASS/DIVISION</p> <p>IDENTIFICATION NUMBER</p> <p>HAZARD WARNING LABEL</p> <p>PACKAGING</p> <p>MARKING</p> <p>EMPLOYEE TRAINING</p>	<p>SHIPPING PAPERS</p> <p>EMERGENCY RESPONSE INFORMATION</p> <p>EMERGENCY RESPONSE TELEPHONE NUMBER</p> <p>CERTIFICATION</p> <p>COMPATIBILITY</p> <p>BLOCKING AND BRACING</p> <p>PLACARDING</p> <p>SECURITY PLAN</p> <p>INCIDENT REPORTING</p>
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Listed above are the major responsibilities of HM shippers. General shipper responsibilities are contained in 49 CFR Part 173. Identification of a hazardous material is the first step, and frequently the most difficult. Of all the shippers' (offerors') responsibilities, the requirement to properly classify a hazardous material is very important. It is from the proper identification of the hazardous materials that the other requirements are based on. A list of all material regulated by the DOT is located in section 172.101



LOADING AND UNLOADING
COMPATIBILITY
BLOCKING AND BRACING
INCIDENT REPORTING
SECURITY PLAN
EMPLOYEE TRAINING

The current 49 CFR is consistent with the international requirements. However, there are some differences in the requirements for shipment by international air, international vessel, and shipments to and from Canada. The HMR addresses the requirements for the movement of shipments prepared in accordance with the international and Canadian regulations in 49 CFR sections 171.11, 171.12 and 171.12(a), respectively.

HAZARDOUS MATERIALS CARRIER RESPONSIBILITY

SHIPPING PAPER
PLACARD AND MARK VEHICLE

This list above contains some of the major responsibilities of HM carriers. Carrier and offeror (shipper) responsibilities frequently overlap. When a motor carrier performs a shipper function, the carrier is responsible for performing that function in accordance with 49 CFR. The cargo space of the vehicle should be suitable for the material being shipped. The vehicle itself must be in sound mechanical condition. The carrier must check to insure that the material offered by the shipper is properly described and packaged. In addition to the provisions of 49 CFR Parts 100-180, interstate motor carriers of placarded loads must comply with the hazardous materials requirements in 49 CFR Part 397.

INCIDENT REPORTING

Immediate notification of a hazardous materials incident by a carrier is required at the earliest practical moment for incidents that occur during the course of transportation (including loading, unloading, and temporary storage) in which as a direct result of the hazardous materials any one or more of the following occurs:

1.
 - i. A person is killed;
 - ii. A person receives an injury requiring admittance to a hospital;
 - iii. The general public is evacuated for one hour or more;
 - iv. A major transportation artery or facility is closed or shut down for one hour or more; or
2. Fire, breakage, spillage, or suspected radioactive contamination occurs involving a radioactive material;
3. Fire, breakage, spillage, or suspected contamination occurs involving an infectious substance other than a diagnostic specimen or regulated medical waste;
4. A release of a marine pollutant occurs in a quantity exceeding 450L (119 gallons) for a liquid or 400 kg (882 pounds) for a solid; or
5. A situation exists of such a nature (e.g., a continuing danger to life exists at the scene of the incident) that, in the judgment of the person in possession of the hazardous material, it should be reported to the National Response Center even though it does not meet the other criteria.

Each notice shall be given telephonically to the Department at (800) 424-8802. Incidents involving etiologic agents may be made to the CDC at (800) 232-0124. For content of report and additional information, please see 171.15.

A written report shall be submitted on DOT Form F 5800.1 for all incidents involving the transportation of hazardous materials unless excepted. Detailed reporting requirements are contained in 171.16.

HAZARDOUS MATERIALS TABLE

Table of Hazardous Materials and Special Provisions

The purpose of the table is to assign proper shipping names, class and division, and guidance for packaging and handling requirements for hazardous materials. It is important to remember to read the instructions contained in front of table 172.101 when using this section. Many violations occur because individuals fail to review these instructions. Information that is available from the Table consists of: symbols that determine applicability, proper shipping name and shipping description, hazard class or division, identification number, packing group, label(s) required, special provisions, packaging authorizations, quantity limitations aboard aircraft, and vessel stowage requirements.

HAZARDOUS MATERIALS



The definition of HAZARDOUS MATERIALS includes those materials designated by the Secretary of the Department of Transportation as posing an unreasonable threat to the public and the environment. The term "Hazardous Materials" includes all of the following: (1) Hazardous Substances, (2) Hazardous Wastes, (3) Marine Pollutants, (4) Elevated Temperature Material (5) Materials identified in 172.101, and (6) Materials meeting the definitions contained in Part 173.

HM REGULATED BY U.S. D.O.T.

CLASS 1 EXPLOSIVES

DIVISION 1.1 MASS EXPLOSIVE HAZARD
DIVISION 1.2 PROJECTION HAZARD
DIVISION 1.3 MASS FIRE HAZARD
DIVISION 1.4 MINOR EXPLOSION HAZARD
DIVISION 1.5 VERY INSENSITIVE EXPLOSIVES

DIVISION 1.6 EXTREMELY INSENSITIVE EXPLOSIVES

Explosives were formerly classified as Class A, B, C or Blasting Agent. A comparison of the old and new classification system is contained in 173.53.

In addition to the change in classification systems we are now concerned with compatibility groups which are designated by alpha characters: 1.1A, 1.2D, etc. Information on the different compatibility groups are contained in 49 CFR 173.52.

CLASS 2 GASES

DIVISION 2.1 FLAMMABLE GASES
DIVISION 2.2 NON-FLAMMABLE GASES
DIVISION 2.3 POISONOUS OR TOXIC

This class includes materials that are Compressed, Dissolved under Pressure, or Pressurized Cryogenic Liquids, and Liquefied Gases

CLASS 3 FLAMMABLE LIQUID

includes materials whose Flash Point (FP) is not more than 141F

NOTE: See Combustible Liquids below

CLASS 4 FLAMMABLE SOLIDS

DIVISION 4.1 FLAMMABLE SOLID

DIVISION 4.2 SPONTANEOUSLY COMBUSTIBLE MATERIAL

DIVISION 4.3 DANGEROUS WHEN WET

CLASS 5 OXIDIZING SUBSTANCES; ORGANIC PEROXIDES

DIVISION 5.1 OXIDIZER

DIVISION 5.2 ORGANIC PEROXIDE

CLASS 6 POISONOUS (TOXIC) AND INFECTIOUS SUBSTANCES

DIVISION 6.1 POISONOUS (TOXIC) MATERIAL

DIVISION 6.2 INFECTIOUS SUBSTANCE

CLASS 7 RADIOACTIVE MATERIAL

CLASS 8 CORROSIVES

CLASS 9 MISCELLANEOUS DANGEROUS GOODS *

*Category includes Environmentally Hazardous Substances, Elevated Temperature Material, Hazardous Wastes, and Marine Pollutants.

COMBUSTIBLE LIQUIDS Materials whose FP is greater than 141 F but less than 200°F are still regulated domestically as combustible liquids. Materials transported domestically only, whose FPs are 100 F up to 141 F may be reclassified as combustible in accordance with 173.120(b).

A **COMBUSTIBLE LIQUID** which does not sustain combustion is not subject to the requirements of the HMRs. See Appendix H, Part 173 for the required tests.

ORM-D

"ORM-D materials" are materials such as a consumer commodity, which although is subject to the regulations presents a limited hazard during transportation due to its form, quantity and packaging. Each ORM-D material and category of ORM-D material is listed in the 49 CFR 172.101 Table and 173.144.

CONSUMER COMMODITIES

Consumer commodities are materials that are packaged and distributed in a form intended for, or suitable for sale through retail sales. In order to determine if a particular hazardous material may qualify as a consumer commodity, refer to the section number in Part 173 identified in column 8 of the 172.101 Table for that material.

EXCEPTIONS:

Agricultural Operations

The transportation of agricultural products (see 49 CFR 171.8) by highway may be excepted from some or all of the provisions of the Hazardous Materials Regulations when transported in accordance with the provisions of 49 CFR 173.5.

Materials of Trade

The transportation of materials of trade (see 49 CFR 171.8) by highway may be excepted from many of the requirements of the Hazardous Materials Regulations when transported in accordance with the procedures contained in 49 CFR 173.6.

HAZARDOUS MATERIALS COMMUNICATIONS

Part 172 of 49 CFR contains the hazardous materials communication requirements. In addition to the hazardous materials table, emergency response requirements, training, and security plan. The term hazardous materials communications commonly refers to shipping papers, marking, labeling and placarding.

Shipping Papers

Shipping paper requirements are contained in 49 CFR Part 172 Subpart C. For the purpose of the hazardous materials regulations, a shipping paper is any shipping document whose purpose is to communicate a hazard, and conforms to the requirements contained in this Subpart. Each person who offers hazardous materials for transportation or transported the hazardous materials on a shipping paper that conforms to the requirements of the HMR. No carrier may transport a hazardous material unless it is accompanied by a shipping paper that is prepared in accordance with the HMR.

The description of hazardous materials on a shipping paper is contained in section 172.202. The basic description now includes proper shipping name, hazard class, identification number, and packaging group. The class names, IMO class and division numbers, or subsidiary hazard classes may be entered in parentheses. Entries are required for number and type packaging and weight (net or gross).

It is important to remember that except for materials in the U. N. Recommendations, the ICAO Technical Instructions, or the IMDG Code, a material that is not a hazardous material according to this sub-chapter may not be offered for transportation or transported when its description on a shipping paper includes a hazard class or an identification number specified in 49 CFR 172.101. This provision is most frequently violated when the shipments involve non-RCRA Waste, which is not considered DOT hazardous materials.

Depending on the material being transported additional information requirements to be entered on the shipping paper are contained in 49 CFR 172.203. Recent changes include entries for: Technical names for n.o.s. and other generic descriptions, Organic peroxides to include concentration, All poisonous materials subject to 172.203(m) where the poisonous constituent is not mentioned in the proper shipping name, for materials meeting the definition of poison-inhalation hazard, (see 171.8) "Poison-Inhalation Hazard" as provided in 172.203(m) and the words "Hazard Zone A," "Hazard Zone B," "Hazard Zone C" or "Hazard Zone D" as appropriate. (Also, see 173.133(b).)

The regulation requires an emergency response telephone number to be placed on the shipping paper. The telephone number must be monitored at all times when the material is in transportation to include storage incidental to transportation. The number must be of a person who is knowledgeable of the hazardous materials being shipped and the appropriate emergency response

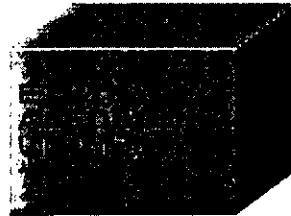
procedures, or a person who has immediate access to a person who has such knowledge. If you use the number for a service provider such as CHEMTREC you must have a valid contract in force with the service provider. This telephone number must be readily identifiable on the shipping paper.

A problem with some Bills of Ladings are the numerous emergency numbers for various types of problems, such as requests for delivery times or requests for safe havens. Emergency responders may have trouble identifying the DOT emergency response telephone number.

The DOT does not dictate who signs the certification on the shipping papers. The individual who signs the certification should be the individual most knowledgeable of the shipment.

Public Law 103-311 amended 49 U.S.C. 5110 to require retention of hazardous materials shipping papers for 1 year.

Marking



The requirements for marking of packages are contained in 49 CFR, Subpart D, Part 172. The basic marking requirement consists of the proper shipping name and identification number of the hazardous materials contained in the package. Markings should be durable, in English, and not obscured by other markings or labels. Depending on the material there may be additional marking requirements. For non-bulk packaging, technical names must be marked in parenthesis in association with the proper shipping name if required by 172.203(k). Identification numbers are not required for ORM-D and limited quantities.

Bulk packaging requirements are in section 172.302. Identification Numbers must be on each side and each end for packages 3785 L (1,000 gals) or more and for cylinders permanently mounted on tube trailer motor vehicles. Identification Numbers on two opposing sides for packages less than 3785 L (1,000 gals). Technical names are not required for bulk packages.

You may not offer or transport a container unless the HM markings apply to the material contained in the package. There is an exception for empty containers if: (1) In a vehicle or freight container, the package is not visible, and is loaded and unloaded by the shipper or consignee, or (2) The markings are securely covered during transport.

The following is a listing of additional marking requirements:

Authorized Abbreviation	Elevated temperature material
Class 7 (radioactive) materials	Portable tanks
Liquid Hazardous Materials in Non-Bulk Packaging	Cargo tanks
Poisonous Hazardous Materials	Tank cars and multi-unit tank car tanks
ORM-D	Bulk packagings other than portable tanks, cargo tanks, tank cars, and multi-tank car tanks Identification number markings
Explosive Hazardous Material	
Marine Pollutant	
Hazardous Substances in non-bulk packagings	

LABELING

General labeling requirements are contained in 49 CFR subpart E Part 172. Each person who offers for transportation or transports a hazardous material shall ensure the package is properly labeled. There are a number of exceptions to the labeling requirements contained in 172.400a. Prohibited labeling is contained in 172.401. The following is a list of additional requirements:

Additional labeling	Label Specifications
Class 7 (radioactive) material	There is a separate section for each of the authorized labels that gives an example of the label and describes the label. Sections 172.411 through 172.450 contain the required design for each label.
Labels for mixed and consolidated packagings	
Authorized label modifications	
Placement of labels	

PLACARDING

General placarding requirements are contained in 49 CFR Subpart F Part 172. Each person who offers for transportation any hazardous materials subject to the HMR shall comply with the applicable placarding requirements. Applicability of placarding requirements 172.500: Placarding is not required for infectious substances, ORM-D, limited quantities, small quantity shipments, and combustible liquids in non-bulk packages. Placards may not be displayed on any packaging, freight container, unit load device, motor vehicle or rail car unless the placard represents a hazardous material loaded into or onto the conveyance unless the shipment is in accordance with the TDG Regulation, the IMDG Code or the UN Recommendations.

General placarding requirements are contained in 172.504. Each bulk packaging, freight container, unit load device, transport vehicle, or rail car containing any quantity of hazardous materials must be placarded on each side and each end with the placards specified in Tables 1 and 2.

172.504 contains a number of notes and exceptions to these requirements. When two or more Table 2 materials are contained in the same transport vehicle, the "Dangerous" placard may be used instead of the specific placard required for each hazard class. However, when 1,000 kg (2,205 lbs.) or more of a single category of HM is loaded on a transport vehicle, the placard specified for that material must be displayed.

172.504(c) contains an exception from the placarding requirement for shipments that contain less 454 kg (1,001 pounds) of Table 2 materials. A frequent problem encountered involves the 1,001 lbs. exception. The 1,001 lbs. is aggregate gross weight. Aggregate gross weight is the total weight of all hazardous materials and its packaging loaded on a single transport vehicle. For example, if a vehicle has 1,500 lbs. of Class 3 materials and 50 lbs. of Class 8 materials, you would have to placard for both Class 3 and Class 8. There are additional requirements for placarding such as:

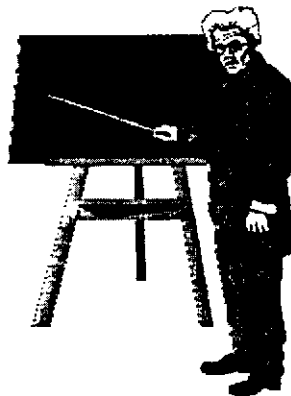
Placarding for subsidiary hazard	Bulk packages
Providing and affixing placards by Highway	Visibility and display of placards
Special placarding provisions by Highway	General specifications for placards
Providing and affixing placards by Rail	There is a section for each placard that gives an example and describes it.

Special placarding provisions by Rail

Freight containers and aircraft unit load devices

NOTE: FOR SPECIFIC REQUIREMENTS FOR PREPARATION OF SHIPMENTS YOU MUST USE THE MOST CURRENT EDITION OF 49 CFR.

HAZARDOUS MATERIALS TRAINING



In addition to the communications requirements that took effect on October 1, 1993, hazmat employers must have trained hazmat employees hired prior to 07/02/93. For complete definition of hazmat employer and hazmat employee please see definitions contained in appendix A.

TRAINING REQUIRED

General awareness/familiarization: General awareness and familiarization training is intended to raise the hazmat employees' awareness of the HMR and the purpose and meaning of the hazard communication requirements. All hazmat employees must have this training.

Function-specific training: Function specific training is intended to teach the necessary knowledge, skills and abilities for an individual's job function.

Safety training: This training provides information concerning the hazards posed by materials in the workplace and personal protection measures. The training may include basic emergency response procedures but is not intended to satisfy the requirements of 29 CFR 1910.120.

Security Training: Each hazmat employee must receive security awareness training. This training must include an awareness of security risks associated with hazardous materials transportation and methods designed to enhance transportation security. After March 25, 2003, hazmat employees must receive this training at their next scheduled recurrent training, but in no case later than March 24, 2006. New hazmat employees must receive this training within 90 days of employment.

In addition to the above security awareness training, hazmat employees of employers that are required to have a security plan must receive in-depth security training on the security plan and its implementation.

Modal specific requirements: Any additional training required by 49 CFR PARTS 174, 175, 176, or 177.

The regulation does not specify sources of training. The US Department of Transportation does not designate sources of training nor certify training courses, instructors and/or schools. It is the hazmat employer's responsibility to determine the adequacy of the training being presented. Training may be in any appropriate format including lecture, conference, self paced instruction, interactive video, etc.

INITIAL TRAINING

A new hazmat employee who changes job functions may perform those functions prior to completion of training, provided the employee performs those functions under the direct supervision of a properly trained and knowledgeable hazmat employee; and the training is completed within 90 days after employment or job function.

RECURRENT TRAINING

Employees must receive the required training every three years or any time there is a change in job function.

RECORDKEEPING REQUIREMENTS

A record of current training, inclusive of the preceding three years, in accordance with this subpart, shall be created and retained by each hazmat employer for each hazmat employee for as long as that employee is employed by that employer as a hazmat employee and for 90 days thereafter. The record shall include: (1) The hazmat employee's name; (2) The most recent training completion date of the hazmat employee's training; (3) A description, copy or the location of the training materials used to meet the requirements; (4) The name and address of the person providing training; and (5) Certification that the hazmat employee has been trained and tested as required by this subpart.

The records required by this rule must be produced upon reasonable demand by an authorized employee of the Department of Transportation. Records may be in any format such as paper or electronic files as long as they contain the required information and are readily available.

Compliance with the current requirements for a CDL with a tank vehicle or hazardous materials endorsement provides a driver with the general knowledge and skills necessary to safely operate a commercial motor vehicle with hazardous materials cargo. This may satisfy the hazardous materials training requirements. As a hazmat employee, additional specialized training may be required based on the job function and material-specific requirements related to the handling of hazardous materials. The hazmat employer must determine the extent to which the CDL endorsement satisfies all training requirements.

EMERGENCY RESPONSE INFORMATION

THE EMERGENCY RESPONSE TELEPHONE NUMBER MUST BE MONITORED AT ALL TIMES WHILE THE SHIPMENT IS IN TRANSIT.
EMERGENCY RESPONSE INFORMATION THAT MUST APPEAR ON THE SHIPPING PAPER OR IN A SEPARATE DOCUMENT MAINTAINED WITH THE SHIPPING PAPER:
DESCRIPTION OF THE HM
IMMEDIATE HAZARDS TO HEALTH
IMMEDIATE METHODS FOR HANDLING SMALL OR LARGE FIRES AND SPILLS OR LEAKS
PRELIMINARY FIRST AID MEASURES

The requirement for Emergency Response information is contained in 49 CFR, Part 172, Subpart G. The number must be maintained at all times that a shipment is in transit. The use of beepers, answering machines and switchboards is not authorized. The phone number must be to someone capable of providing information on the material.

Written emergency response information must be appropriate for the hazardous material being transported. If the carrier's equipment has an emergency response guide or similar document on board there is no requirement to provide a separate emergency response document.



For transportation by highway, if a transport vehicle contains hazardous materials for which a shipping paper is required and the transport vehicle is separated from its motive power and parked at a location other than a facility operated by the consignee, consignor, or carrier, the carrier shall (1) Mark the transport vehicle with the telephone number of the motor carrier on the front exterior near the brake hose or electrical connection; or (2) have the shipping paper and emergency response information readily available on the transport vehicle. This requirement does not apply if the identification number for each hazardous materials contained therein is marked on the outside of the vehicle on an orange panel or white square on point placard.

SECURITY PLANS

The security plan requirements in Part 172 Subpart I of the Hazardous Materials Regulations (HMR) require each hazmat employer subject to the security plan requirements to establish and implement a security plan. The employer is also required to train their hazmat employees on the security plan. The purpose of these requirements is to enhance the security of hazardous materials transported in commerce. Employers must establish and implement their security plan by **September 25, 2003**, and by **December 22, 2003**, each employee must receive training on the security plan and its implementation.

The security plan requirements apply to each person who offers for transportation in commerce or transports in commerce one or more of the following hazardous materials:

1. A highway route-controlled quantity of a Class 7 (radioactive) material, as defined in 173.403 of this subchapter, in a motor vehicle, rail car or freight container;
2. More than 25 kg (55 pounds) of a Division 1.1, 1.2, or 1.3 (explosive) material in a motor vehicle, rail car or freight container;
3. More than one L (1.06 qt) per package of a material poisonous by inhalation, as defined in 171.8 of this subchapter, that meets the criteria for Hazard Zone A, as specified in 173.116(a) or 173.133(a) of this subchapter;
4. A shipment of a quantity of hazardous materials in a bulk packaging having a capacity equal to or greater than 13,248 L (3,500 gallons) for liquids or gases or more than 13.24 cubic meters (468 cubic feet) for solids;
5. A shipment in other than a bulk packaging of 2,268 kg (5,000 pounds) gross weight or more of one class of hazardous materials for which placarding of a vehicle, rail car, or freight container is required for that class under the provisions of subpart F of this part;
6. A quantity of hazardous material that requires placarding under the provisions of subpart F of this part; or
7. A select agent or toxin regulated by the Centers for Disease Control and Prevention under 42 CFR part 73.

The above first six categories are the same categories that require Federal Hazmat Registration. Number 7 is not listed for Federal Hazmat Registration.

PACKAGING

What is Performance Oriented Packaging?

It is a packaging construction system based on performance standards developed in the form of Recommendations by the United Nations Committee of Experts on the Transport of Dangerous Goods (UN Recommendations). The UN standards have general requirements for materials, construction and a maximum capacity. Containers must pass or be capable of passing a series of performance tests before they are authorized for the carriage of hazardous materials. The international standards have general requirements for materials, construction and a maximum capacity as compared to detailed DOT specifications for non-bulk packagings formerly contained in 49 CFR, Part 178.

Packaging requirements are based on the Packing Group of the material, its vapor pressure, and chemical compatibility between the package and the HM. Non-bulk packaging standards are based upon a number of performance tests. In addition to UN Recommendation performance oriented tests, a vibration test for non-bulk packaging is required domestically. Reuse of plastic and metal is drums based on minimum thickness requirements. (This substitutes for the lack of performance tests in UN standards with regard to puncture resistance, abrasion resistance and metal fatigue). Package manufacturers must provide written notification to customers of any specification shortfalls or steps to be taken to conform with applicable specification. Performance tests for UN packaging, including design qualification tests and periodic retests, are included in Part 178.

Packing Groups



The packing group designated in the 172.101 Table, column 5, indicates the degree of danger presented by the material. The shipper is responsible for determining the appropriate packing group.

Packing Group	Degree of Danger
I	Great
II	Medium
III	Minor

If more than one packing group is indicated for an entry, the packing group for the HM is determined using the criteria in 49 CFR, Part 173, Subpart D.

Packaging Responsibilities

General requirements are contained in 49 CFR 171.2(g). No person may represent, certify, mark, sell or offer a packaging or container as meeting the requirements of the HMR, governing its use in transportation of a hazardous material, whether or not it is used or is intended to be used for transportation of a hazardous material, unless the packaging or container is manufactured, fabricated, marked, maintained, reconditioned, repaired or retested, as appropriate, in accordance with the HMR.

The shipper's responsibility is to classify and describe the HM in accordance with Parts 172 and 173. The shipper must determine that the packaging or container is an authorized packaging, including all special requirements, and that the package has been manufactured, assembled and marked in accordance with the HMR. The shipper may accept the manufacturer's certification, specification, approval or exemption marking in determining the packaging compliance. Based on written instructions by the manufacturer [178.2(c)], the shipper performs all actions which need to be taken for the packaging to conform to the requirements of Part 178. The shipper must perform any packaging functions required by 173.24, 173.24a, and 173.24b for which the shipper is responsible such as filling limits, compatibility between the HM and container, and securing and cushioning.

It is the responsibility of the packaging manufacturer and the person who offers hazardous materials for transportation, to the extent that assembly functions including final closure are performed by the latter, to assure that each package is capable of passing the prescribed tests.

Performance Tests - The following tests are performed as appropriate for each type of package: Drop Test, 178.603; Leakproofness Test, 178.604; Hydrostatic pressure Test, 178.605; Stacking Test, 178.606; Cooperage Test for Bung-type Wooden Barrels, 178.607; Chemical Compatibility Test for Plastic Receptacle, 178.608; Vibration Standard, 173.24a(a)(5).

NOTE: Each section must be consulted to determine the applicable test for each type of container.

PACKAGE TESTING consists of the following: Design Qualification Testing, 178.601(c)(1); Periodic Retesting, 178.601(c)(2); Production Testing, 178.601(c)(3); Frequency of Periodic Testing, 178.601(e); Test Samples, 178.601(f).

The person who manufactures a package subject to the requirements of the hazardous materials regulations is responsible to insure the package is in conformance with the requirements contained in 49 CFR, Part 178. When a package is required to be marked with a UN standard or DOT specification, the package must meet all the requirements of the regulation, including testing. The manufacturer or person certifying that the package is in compliance with Part 178 must inform in writing each person to whom the packaging is transferred of all requirements of Part 178 not met at time of transfer, and all actions that need to be taken for the package to conform to requirements of Part 178. The written statements must be retained by the manufacturer for at least one year per 49 CFR 178.2(c). When filling packages with hazardous materials the shipper must comply with these written instructions.

Performance Oriented Package Marking

The Manufacturer's Marking Requirement is contained in 49 CFR 178.503.

The United Nations symbol.

Packaging identification code consisting of:

Type of packaging

Material of construction

Category of packaging (when appropriate)

A letter identifying the performance standard.

X - Meeting packing group I, II and III tests.

Y - Meeting packing group II and III tests.

Z - Meeting only packing group III tests.

Specific gravity or mass.

Specific gravity for packaging without inner linings designed to hold liquids rounded down to the first decimal for those nonviscous liquids having a specific gravity greater than 1.2.

Maximum gross mass in kilograms for viscous liquids, solids, or inner packagings.

A letter "S" for packaging intended only for solids or inner packagings, test pressure in kilopascals of the hydrostatic test pressure.

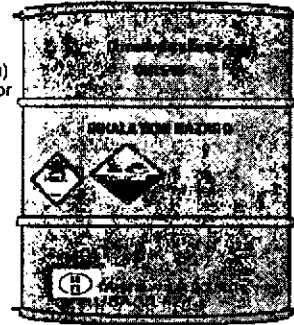
The last two digits of the year of manufacture.

The letters indicating the country of origin (e.g., "USA").

The name and address or symbol of the person applying the marks.

Other markings: Month of manufacture for plastic drums (1H) and jerricans (3H). May be marked in a different location. Minimum thickness of packaging material in millimeters (mm) for metal or plastic drums or jerricans intended for reuse. Tare weight preceded by "TW" for packaging intended for nitric acid.

Reconditioned packaging. Items 1-6 and thickness in millimeters must be applied in a permanent manner able to withstand reconditioning.



The following additional markings are required:

Name of the country in which the reconditioning was performed.

Name and address or symbol of the reconditioner.

Month and last two digits of the year of reconditioning.

The letter "R".

The letter "L" for packaging passing a leakproofness test.

LOADING AND UNLOADING

49 CFR Parts 174-177 contain additional modal requirements for transporting hazardous materials by rail, water, air and highway. Part 177 for highway contains a number of general and specific requirements for loading and unloading hazardous materials in 177.834-177.854.

BLOCKING AND BRACING

Hazardous materials packages should be secured in a transport vehicle to prevent damage during transportation. The motor carrier is responsible for blocking and bracing HM for shipment by highway. Therefore a carrier who removes and or alters blocking and bracing material installed by the shipper is not necessarily in violation of federal law. If the hazardous materials leaks or spills during transport due to insufficient blocking and bracing, the motor carrier is at fault.

COMPATIBILITY

Both shippers and carriers are responsible for compatibility. The requirement for shippers to comply with compatibility considerations is contained in 49 CFR 173.22. In order to determine compatibility for shipments by highway, shippers and carriers should refer to 49 CFR 177.848 - Segregation of hazardous materials.

This section applies to: Packages that require labeling, multi-compartmented cargo tanks, and portable tanks loaded in transport vehicles or freight containers. If a vehicle is to be transported aboard a vessel, other than a ferry, and is loaded with hazardous materials, that vehicle must meet the compatibility requirements of Part 176. Regardless of the hazard class, cyanide and cyanide mixtures can not be transported with acids.

In order to determine compatibility you are now required to be familiar with two tables which are:

Segregation Table for Hazardous Materials is used for all materials. However, this table is only used for Class 1 materials when comparing Class 1 with other classes/divisions of hazardous materials.

Compatibility Table for Class 1 (Explosive) Materials is used for determining compatibility for one Class 1 material and another Class 1 material.

When using the aforementioned tables be sure to read the entire section, 178.848, and be aware that there are special instructions and exceptions listed. In addition to this section, shippers and carriers should check sections 177.834 through 177.854 for any additional handling requirements.

APPENDIX A

DEFINITIONS

AGRICULTURAL PRODUCT :

An agricultural product means a hazardous material, other than a hazardous waste, whose end use directly supports the production of an agricultural commodity including, but not limited to a fertilizer, pesticide, soil amendment, or fuel. An agricultural product is limited to a material in Class 3, 8, or 9, Division 2.1, 2.2, 5.1, or 6.1, or an ORM-D material.

COMMERCE :

The term "commerce" means trade, traffic, commerce, or transportation within the jurisdiction of the United States.

(A) between a place in s State and any place outside of such State, or (B) which affects trade, traffic, commerce, or transportation described in subparagraph (A). 49 USC 5101 et seq.

CONTRACTORS:

Any person who, under contract with any department, agency, or instrumentality of the executive, legislative, or judicial branch of the Federal Government, transports, or causes to be transported or shipped, a hazardous material or manufactures, fabricates, marks, maintains, reconditions, repairs, or tests a package or container which is represented, marked, certified, or sold by such person as qualified for use in transportation of hazardous materials shall be subject to and comply with all provisions of the Federal Hazardous Material Transportation Law, or the regulations issued thereunder.

HAZMAT EMPLOYER:

A person who uses one or more of its employees in connection with: transporting hazardous materials in commerce; causing hazardous materials to be transported or shipped in commerce; or representing, marking, certifying, selling, offering, manufacturing, reconditioning, testing, repairing or modifying containers, drums, or packaging as qualified in the transportation of hazardous materials. This term includes an owner-operator of a motor vehicle which transports hazardous materials in commerce. This term includes any department, agency, or instrumentality of the United States, a State, a political subdivision of a State, or an Indian tribe described in the first sentence of this definition.

HAZMAT EMPLOYEE:

A person who is employed by a hazmat employer and who in the course of employment directly affects hazardous materials transportation safety. This term includes an owner-operator of a motor vehicle which transports a hazardous material in commerce. This term includes an individual, including a self-employed individual, employed by a hazmat employer who, in the course of employment: (1) Loads, unloads, or handles hazardous materials; (2) Manufactures, tests, reconditions, or repairs, modifies, marks, or otherwise represents containers, drums, or packages as qualified for use in the transportation of hazardous materials; (3) Prepares hazardous materials for transportation; (4) Is responsible for safety of transporting hazardous materials; or (5) Operates a vehicle used to transport hazardous materials.

MATERIALS OF TRADE

Materials of Trade means a hazardous material, other than a hazardous waste, that is carried on a motor vehicle--(1) For the purpose of protecting the health and safety of the motor vehicle operator or passengers; (2) For the purpose of supporting the operation of a motor vehicle (including its auxiliary equipment) or; (3) By a private motor carrier (including vehicles operated by a rail carrier) in direct support of a principal business other than transportation by a motor vehicle.

OFFEROR:

The term offeror means any person who performs, or is responsible for performing, any of the pre-transportation functions required under the HMR for transportation of a hazardous material; tenders or makes a hazardous material available to a carrier for transportation in commerce; or both performs, or is responsible for performing, pre-transportation functions and tenders or makes a hazardous material available to a carrier for transportation

PERSON: As of 01/24/2005

Person means an individual, firm, copartnership, corporation, company, association, or joint-stock association (including any trustee, receiver, assignee, or similar representative); or a government or Indian tribe (or an agency or instrumentality of any government or Indian tribe) that transports a hazardous material to further a commercial enterprise or offers a hazardous material for transportation in commerce. Person does not include the following:

1. The United States Postal Service.
2. Any agency or instrumentality of the Federal government, for the purposes of 49 U.S.C. 5123 (civil penalties) and 5124 (criminal penalties).
3. Any government or Indian tribe (or an agency or instrumentality of any government or Indian tribe) that transports hazardous material for a governmental purpose.

SHIPPER:

The word "shipper" is not specifically defined in the HMR (49 CFR Parts 170-179), due primarily to the fact that it is not possible for the Department to account for the numerous commercial arrangements that may exist under that concept. Although the word "shipper" does appear, it is used in an ordinary layman's manner rather than as a specific, technical term of art. Consequently, responsibilities generally are placed on "offerors" for performance of the functions associated with "offering" hazardous materials for transportation (e.g., see the general duty and applicability provisions in 49 CFR 171.1, 171.2, 172.3, and 173.1).

TRANSPORTS :

The term "transports" or "transportation" means any movement of property by any mode, and any loading, unloading, or storage incident thereto.

TRANSPORTATION IN COMMERCE ON A PUBLIC HIGHWAY:

Transportation on (across or along) roads outside of Government properties generally is transportation in commerce. If a road is used by members of the general public (including dependents of Government employees) without their having to gain access through a controlled access point, transportation on (across or along) a road on Government properties is in commerce. On the other hand if access to a road is controlled at all times through the use of gates and guards, transportation on that road is not in commerce.

The COMMERCIAL MOTOR VEHICLE SAFETY ACT OF 1986 required DOT to establish Federal standards for States to test and license truck and bus drivers, establish uniform penalty provisions, and establish a data system containing data on drivers.

COMMERCIAL DRIVERS LICENSE REGULATION APPLICABILITY :

THE RULES IN THIS PART APPLY TO EVERY PERSON WHO OPERATES A COMMERCIAL MOTOR VEHICLE IN INTERSTATE, FOREIGN, OR INTRASTATE COMMERCE AND TO ALL EMPLOYEES OF SUCH PERSONS.

COMMERCIAL DRIVERS LICENSE:

Does not apply to active duty military drivers.

Does apply to Government Civilian Employees.

MOTOR CARRIER SAFETY ACT OF 1990 :

A major provision of this legislation prohibits Federal agencies from using motor carriers rated unsatisfactory to transport hazardous materials in quantities requiring placarding.

SAFETY RATINGS AND CARRIER PROFILES are public information and may be obtained on the Internet on a system called SAFER (Safety and Fitness Electronic Record) at <http://safersys.org>

APPENDIX B

<p>Eastern Resource Center Joseph Evans, HM Specialist 802 Cromwell Park Drive Suite N Glen Burnie, MD 21061 Com (443) 703-2240 Fax (443) 703-2253 Internet Address: Joseph.evans@fmcsa.dot.gov Connecticut (860) 659-6700 Delaware (302) 734-8173 District of Columbia (202) 219-3553 Maine (207) 622-8358 Maryland (410) 962-4342 Massachusetts (617) 494-2770 New Hampshire (603) 228-3112 New Jersey (609) 637-4222 New York (518) 431-4145 Pennsylvania (717) 221-4443 Puerto Rico (787) 766-5985 Rhode Island (401) 431-6010 Vermont (802) 828-4480 Virginia (804) 771-8585 West Virginia (304) 347-5935</p>	<p>Mid-West Resource Center Joseph DeLorenzo 19900 Governors Drive, Suite 210 Olympia Fields, Illinois 60461-1021 Com (708) 283-3577 Fax (708) 283-3579 Internet Address: Joseph.DeLorenzo@fmcsa.dot.gov Illinois (217) 492-4608 Indiana (317) 226-7474 Iowa (515) 233-7400 Kansas (785) 267-7288 Michigan (517) 377-1866 Minnesota (651) 291-6150 Missouri (573) 636-3246 Nebraska (402) 437-5986 Ohio (614) 280-5657 Wisconsin (608) 829-7530</p>
<p>Southern Resource Center Tim Phillips 100 Alabama Street, 17th Floor Atlanta, Georgia 30303-3104 Com (404) 562-3600 Fax (404) 562-3704 Internet Address: charles.phillips@fmcsa.dot.gov Alabama (334) 223-7244 Arkansas (501) 324-5050 Florida (850) 942-9338 Georgia (404) 562-3620 Kentucky (502) 223-6779 Louisiana (225) 757-7640 Mississippi (601) 965-4219 New Mexico (505) 346-7858 North Carolina (919) 856-4378 Oklahoma (405) 605-6047 South Carolina (803) 765-5414 Tennessee (615) 781-5781 Texas (512) 536-5980</p>	<p>Western Resource Center Alan Brown Golden Hills Office Center 12600 W Colfax Ave Suite B-300 Lakewood, CO 80215 Com (303) 407-2350 Fax (303) 407-2339 Internet Address: Alan.Brown@fmcsa.dot.gov Alaska (907) 271-4068 Arizona (602) 379-6851 California (916) 930-2760 Colorado (720) 963-3130 Hawaii (808) 541-2790 Idaho (208) 334-1842 Montana (406) 449-5304 Nevada (775) 687-5335 North Dakota (701) 250-4346 Oregon (503) 399-5775 South Dakota (605) 224-8202 Utah (801) 963-0096 Washington (360) 753-9875 Wyoming (307) 772-2305</p> <p>Samoa (808) 541-2700 Guam (808) 541-2700 Northern Mariana (808) 541-2700</p>

APPENDIX C

PUBLICATION SOURCES

Copies of the regulations may be purchased from the nearest Government Printing Office Bookstore. Commercial Sources are also listed on PHMSA's Hazardous Materials Information Exchange (HMIX). The HMIX is a computer bulletin board listing valuable information on rulemakings, training, and publications. For more information call 1-800-467-4922 or contact PHMSA at:

Pipeline and Hazardous Materials Safety Administration
1200 New Jersey Avenue SE, DHM-50
Washington, D.C. 20590-0001
Internet HAZMAT.DOT.GOV

The following is a partial listing of sources for additional publications and training material. This list is provided as a courtesy and is not an endorsement for these companies or their products. For a more detailed listing you may write:

J.J. Keller & Associates, Inc 7273 State Road 76, Neenah, WI 54957-0368 (920) 722-2848 (800) 558-5011	Learncom, Inc 38 Discovery, Suite 250 Irvine, CA 92618 (800) 969-2711 learncom.com
Sciencetech LLC 910 Clopper Rd Galtersburg, MD 20877 (301) 258-2500 FAX (301) 258-1731	Mancomm 317 West 4th Street Davenport, IA 52801 (877) 626-2666 mancomm.com
American Trucking Association, Inc. 220 Mills Road	Compressed Gas Association 4221 Walney Road 5th Floor

Alexandria, VA 22314 (800) ATA-LINE (703) 838-1754	Chantilly, VA 20151 (703) 788-2700
LabelMaster 5724 North Pulaski Road Chicago, IL 60646 (312) 478-0900 (800) 621-5808	Emergency Film Group 140 Cooke Street Edgartown, MA 02539 (800) 842-0999
Idaho Dept. of Law Enforcement MCSAP Division Video Dept 700 South Stratford Drive Mendham, ID 83680	Dangerous Good Advisory Council 1100 H Street NW, Suite 740 Washington DC 20005 (202) 289-4550 (800) 634-1598

Find this page at: <http://www.fmcsa.dot.gov/safety-security/hazmat/complyhmregs.htm>



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Federal Motor Carrier Safety Administration
1200 New Jersey Avenue SE, Washington, DC 20590 • 1-800-832-5660 • TTY: 1-800-877-8339 • [Field Office Contacts](#)