



U.S. Department  
of Transportation

**Research and  
Special Programs  
Administration**

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

SEP 7 1999

Mr. Jerry Davis  
Safety-Kleen Corporation  
1301 Gervais Street, Suite 300  
Columbia, South Carolina 29201

Ref. No. 99-0012

Dear Mr. Davis:

This is in response to your letter asking if it is acceptable for Safety-Kleen Corporation to include the technical names of several different waste mixtures and solutions, having the same proper shipping name, hazard class, and identification number, in block "15" of a Uniform Hazardous Waste Manifest (UHWM). For example, several different wastes from several different generators are described on the UHWM using a generic shipping name, such as "Waste flammable liquid, n.o.s., 3, UN 1993, PG II." The technical names for these different wastes are entered in block "15" of the UHWM. I apologize for the delay in responding and hope it has not caused any inconvenience.

Under the HMR, both the basic description and any additional descriptive information required to be associated with the basic description under the provisions of 49 CFR 172.203, should appear in block "11" of the UHWM. Any additional information required by 49 CFR 172.203 that is required to be placed "in association with the basic description" may follow the basic description in any reasonable format, provided it is clearly part of that specific entry. Although it is preferable to use block "11," in those instances where only one hazardous material description is entered on the UHWM, block "J" in addition to block "11" may be used to include the technical name entries.

Thus, no exemption is required when only one basic description is used to describe several generators' hazardous wastes on the UHWM, provided the packages contain hazardous wastes with the same proper shipping name, hazard class, identification number, and packing group, and block "J" is used to identify the technical names of the constituents of the mixtures or solutions.

I hope this satisfies your inquiry. If we can be of further assistance, please contact us

Sincerely,

Delmer F. Billings  
Chief, Standards Development  
Office of Hazardous Materials Standards



990012

172.203



Engron  
Boettch  
§ 172.203  
99-0012

**VIA FACSIMILE TRANSMISSION AND U.S. MAIL**

January 5, 1999

Delmer Billings  
Chief, Standards Development  
Research and Special Programs Administration  
U.S. Department of Transportation  
400 Seventh Street, Southwest  
Washington, DC 20590-0001

**SUBJECT: REQUEST FOR INTERPRETATION**

Dear Mr. Billings:

Safety-Kleen Corp. ("S-K") is requesting an interpretation of 49 CFR 172.203 (k)(1) and (2). 49 CFR 172.203 (k)(1) requires us to enter the technical name of a hazardous material on the shipping paper when using a generic shipping name listed in 49 CFR 172.203 (k)(3) to describe a hazardous material. When describing a mixture or solution of two or more hazardous materials, 49 CFR 172.203 (k)(2) requires us to enter the technical names (in parentheses) of at least two components most predominately contributing to the hazards.

Numerous generic shipping descriptions are used to describe various mixtures. These mixtures frequently have the same dangers and hazards, even though they may be composed of different concentrations of various chemicals. Presently, S-K personnel must enter a generic shipping description, with the appropriate technical names, for every mixture shipped. Doing so, in turn, significantly increases the number of shipping descriptions entered on the shipping paper, the number of shipping papers required for transportation, and the number of employees required to manage the shipping papers.

S-K wishes to combine and include the technical names associated with generic shipping descriptions in one location on the shipping paper, as long as the proper shipping name, hazard class, and identification number are the same. This request is due to the financial burden we are presently experiencing as a result of managing an enormous number of shipping papers. For example, nearly 7,500 shipping papers are received at our facilities on a daily basis; another 3,500 are prepared daily by S-K personnel for outgoing shipments.

SAFETY-KLEEN CORP.

1301 GERVAIS STREET, SUITE 300

COLUMBIA, SOUTH CAROLINA 29201

803/933-6434

FAX 803/933-6435



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Attached is a scenario that describes what we are presently doing and what we would like to do going forward. Our question is summarized as follows: Will the Research and Special Programs Administration ("RSPA") grant us permission to combine and include the technical names associated with generic shipping descriptions in one location on the shipping paper, as long as the proper shipping name, hazard class, and identification number are the same?

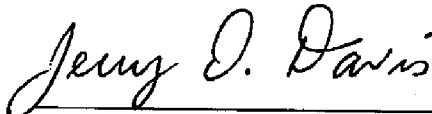
We previously submitted our request as an application for an exemption to the Exemptions and Approvals Department. However, upon review, Helen Engrum and Ann Mazzullo said that our request should be processed as an interpretation rather than an exemption. Your immediate response is greatly appreciated.

Please feel free to contact me at (803) 933-6434 should you have any questions or need additional information.

Sincerely,

**SAFETY-KLEEN CORP.**

By:



Jerry D. Davis

Director, Corporate Transportation Compliance