



U.S. Department  
of Transportation

**Pipeline and  
Hazardous Materials Safety  
Administration**

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

**MAR 30 2006**

Mr. Eric Fischer  
NACA Logistics  
1477 Hamilton Parkway  
Itasca, IL 60143

Reference No. 06-0056

Dear Mr. Fischer:

This is in response to your February 27, 2006 letter asking us to confirm the accuracy of an answer we provided in a February 21, 2001 letter to Garry Howell of the Overnite Transportation Company concerning whether or not a shipper may enter more than one emergency response telephone number on a shipping paper for a hazardous materials shipment under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). In your example, you state you receive some bills of lading with two emergency response telephone numbers accompanied by wording stating one number is available from "8:00 AM to 5:00 PM" and the other is available all other times.

The answer is yes. More than one emergency response telephone number may be entered on a shipping paper and the numbers may be active for different times provided that together they satisfy the requirements prescribed in § 172.604(a) that an emergency response telephone number be monitored at all times the hazardous material is in transportation, including storage incidental to transportation. The person monitoring the number must be knowledgeable of the characteristics of the hazardous material and have comprehensive emergency response information about the material, or immediate access to a person who possesses such knowledge and information. See § 172.604(a)(1) and (a)(2). Although the HMR do not currently state the shipper is required to provide the time period for which an emergency response telephone with a limited time is available, it is the opinion of this Office that the shipper should clearly state the time period the number is available and to which number the restricted time applies.

I hope this information is helpful.

Sincerely,

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



060056

172.604(a)

Nickels, Matthew <PHMSA>

Edmanson

From: eric.fischer@vanguardlogistics.com  
Sent: Monday, February 27, 2006 9:09 AM  
To: INFOCNTR <PHMSA>  
Subject: Information Center Comments/Questions

§172.604  
Emergency Response Telephone  
Number 06-0056

Below is the result of your feedback form. It was submitted by Eric Fischer (eric.fischer@vanguardlogistics.com) on Monday, February 27, 2006 at 09:08:41.

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Email: eric.fischer@vanguardlogistics.com

Name: Eric Fischer

Category: Emergency Response Information (Sections 172.1 - 172.807)

Organization: NACA Logistics

Street: 1477 Hamilton Parkway

City: Itasca

State: Illinois

Zip Code: 60143

Phone: 847-238-5024

Fax: 847-238-5284

Comments: Dear Sirs,  
I would like to receive an interpretation of 172.604 concerning the use of multiple emergency response telephone numbers on a shipping paper. A related interpretation was issued by John Gale to the Overnite Transportation Co on Feb 21, 2001 with reference number 01-0018.

When required, any hazmat shipment we carry would need an emergency response phone number to be valid 24 hours a day. Some of our shippers list multiple emergency response numbers to cover the 24 hour period. For example, they might list their company's phone number and state "8am-5pm" and then list another number to cover the time outside of the normal work day period. So each number individually is not valid 24 hours a day but if used together, they are.

I do not believe this practice meets the requirements of 172.604. Am I correct?

Thank you for your time and help,  
Eric Fischer  
Hazardous Materials Manager  
NACA Logistics



U.S. Department  
of Transportation

**Research and  
Special Programs  
Administration**

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

FEB 21 2001

Mr. Garry Howell  
Environmental Supervisor  
Overnite Transportation Company  
P.O. Box 246  
Gaffney, SC 29341-0246

Ref. No. 01-0018

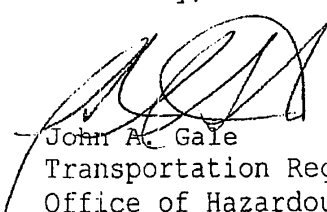
Dear Mr. Howell:

This is in response to your letter dated January 10, 2001, concerning hazardous material shipping paper requirements under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Your questions are paraphrased and answered as follows:

- Q1. May a "#" sign be used as a unit of measure to indicate weight on a shipping paper (i.e., pounds)?
- A1. Yes. Section 172.202(a)(5) does not prohibit the use of a "#" sign as a unit of measurement.
- Q2. May a shipping paper contain more than one emergency response telephone number?
- A2. Yes. However, when more than one emergency response telephone number is entered on a shipping paper, each must meet the requirements under § 172.604(a) and (b). In addition, an emergency response telephone number that is specific to a particular shipping description must be clearly identified as such.

I hope this satisfies your request.

Sincerely,

  
John A. Gale  
Transportation Regulations Specialist  
Office of Hazardous Materials Standards



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