



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

1200 New Jersey Ave., S.E.
Washington, DC 20590

SEP 17 2008

Mr. Thomas R. Wright
Idaho State Police
5205 So. 5th Street
Pocatello, Idaho 83201

Ref. No.: 08-0080

Dear Mr. Wright:

This responds to your email regarding shipping paper requirements under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180).

According to your email, the Chevron Pipe Line Company prepares shipping papers for truck drivers who are hauling gasoline and diesel fuel for several companies. You describe a situation in which a driver of a cargo tank motor vehicle consisting of two separate cargo tanks, one of which is compartmented, picks up three loads described on three separate shipping papers, as follows:

Load 1: 8,200 gallons of gasoline to be shipped to Chevron gas stations. The driver loads 5,000 gallons in the first cargo tank and 3,200 gallons in a compartment of the second cargo tank.

Load 2: 1,200 gallons of gasoline (a different blend) for Sinclair gas stations, which is loaded into in a separate compartment on the second cargo tank.

Load 3: 1,200 gallons of diesel fuel, consignee unspecified, which is loaded in a separate compartment on the second cargo tank.

The driver leaves the loading facility with three shipping papers. You ask how the number and type of packages should be shown on the shipping papers.

There are a variety of ways this shipment could be described. The three original shipping papers may be used, if there is some indication of the type of package on each shipping paper (e.g., "cargo tank motor vehicle", "cargo tank", or "cargo tank compartment"). Alternatively, the shipping information could be combined in a single document describing the shipment in any practical manner which includes a package type (i.e., "cargo tank motor vehicle", "cargo tank", or "cargo tank compartment") and the shipping descriptions for gasoline and diesel fuel. Since materials in bulk packages are excepted from requirements to identify the total

quantity by mass or volume, it is permissible but not necessary to indicate the mass or volume.

Two examples of possible descriptions are as follows:

Description 1: 1 Cargo tank motor vehicle containing:

UN1203, Gasoline, 3, II

UN1202, Diesel Fuel, 3, III

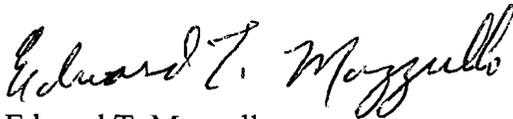
Description 2: 1 Cargo tank: UN1203, Gasoline, 3, II, 5000 gallons

1 cargo tank: UN1203, Gasoline, 3, II, 4400 gallons

UN1202, Diesel Fuel, 3, III, 1200 gallons

I hope this information is helpful. If we can be of further assistance, please contact us.

Sincerely,



Edward T. Mazzullo

Director

Office of Hazardous Materials Standards

Drakeford, Carolyn <PHMSA>

From: INFOCNTR <PHMSA>
Sent: Friday, March 21, 2008 3:31 PM
To: Drakeford, Carolyn <PHMSA>
Subject: FW: Information Center Comments/Questions

Engram
3172.202(a)(7)
Shipping Papers
08-0080

Carolyn,

Could you process this as a formal request for interpretation? Thanks!

Erin

-----Original Message-----

From: thomas.wright@isp.idaho.gov [mailto:thomas.wright@isp.idaho.gov]
Sent: Friday, March 21, 2008 3:10 PM
To: INFOCNTR <PHMSA>
Subject: Information Center Comments/Questions

Below is the result of your feedback form. It was submitted by Thomas R. Wright (thomas.wright@isp.idaho.gov) on Friday, March 21, 2008 at 15:10:07.

Email: thomas.wright@isp.idaho.gov

Name: Thomas R. Wright

Category: Other questions?

Organization: Idaho State Police

Street: 5205 So. 5th St.

City: Pocatello

State: Idaho

Zip Code: 83201

Phone: 208-236-6466

Fax: 208-236-6068

Comments: Reference 172.202(a)(7) Which requires the # and type of packages that need to be listed on a shipping paper. My question is as follows for cargo tanks with multiple compartments:

The Chevron Pipe Line Co. is making shipping papers for truck drivers who are hauling gasoline and diesel fuel for several companies. The question came up on what is the proper way to list on shipping papers the number and type of containers when a cargo tank driver has multiple shipping papers for loads on the two cargo tanks.

For example driver A picks up 8,100 gallons of gasoline to be shipped to Chevron gas stations. He loads 5,000 gallons in the first cargo tank and 3,200 gallons in the second cargo tank.

The same driver picks up a different blend of gasoline for Sinclair gas stations and loads 1,200 gal. of the gasoline in a separate compartment on the second cargo tank. The 1,200 gallons of gas is listed on a separate shipping paper.

The driver also loads 1200 gallons of diesel fuel on the second cargo tank and makes a separate shipping paper for the diesel fuel.

All the above is contained in the two cargo tanks and the driver leave the loading facility with three shipping papers.

How should the # and type of packages be shown on the shipping papers?