

## GUIDE FOR SHIPPERS/GENERATORS

Use of Guide – This guide is presented as an aid to shippers of hazardous materials. It does not contain or refer to all of the DOT requirements for shipping hazardous materials. For specific details, refer to the Code of Federal Regulation (CFR), Title 49, Transportation, Parts 100-199.

The following is offered as a step-by-step program to aid compliance with the applicable DOT Regulations.

STEP 1 – DETERMINE THE PROPER SHIPPING NAME - The shipper must determine the proper shipping name of the materials as listed in the Hazardous Materials Table, Sec. 172.101, Column (2).

STEP 2 – DETERMINE THE HAZARD CLASS OR CLASSES

- A. Refer to the Table, Sec. 172.101, Column (3) and locate the hazard class of the material.
- B. If more than one class is shown for the proper shipping name, determine the proper class by definition.
- C. If the materials have more than one hazard, classify the material based on the order of hazards in Sec. 173.2.

STEP 3 – SELECT THE PROPER IDENTIFICATION NUMBERS

- A. Refer to the Table, Sec. 172.101, Column (3a) and select the Identification Number (ID) that corresponds to the proper shipping name and hazard class.
- B. Enter the ID number(s) on the shipping papers and display them, as required, on packaging's, placards and/or orange panels.

STEP 4 – DETERMINE THE MODE(S) OF TRANSPORT TO ULTIMATE DESTINATIONS

- A. As a shipper, you must assure yourself that shipment complies with the various modal requirements.
- B. The modal requirements may affect the following: (1) Packaging; (2) Quantity per package; (3) Marking; (4) Labeling; (5) Shipping papers; (6) Certification.

STEP 5 – SELECT THE PROPER LABEL(S) AND APPLY AS REQUIRED

- A. Refer to the Table, Sec. 172.101, Column (4) for required label(s).
- B. For details on labeling refer to: (1) Additional Labels, Sec. 172.404; (2) Location of Labels, Sec. 172.406; (3) Packagings (Mixed or Consolidated), Sec. 172.404(a) and (b); (4) Packages Containing Samples, Sec. 172.402(h); (5) Radioactive Materials, Sec. 172.403; (6) Authorized Label Modifications, Sec. 172.405.

STEP 6 – DETERMINE AND SELECT THE PROPER PACKAGES

- A. Refer to the Table, Sec. 172.101, Column (5a) for exceptions and Column (5b) for authorized packagings. Consider the following when selecting an authorized container; Quantity per package; Cushioning material, if required; Proper closure and reinforcement; Proper pressure; Outage; etc. as required.
- B. If packaged by a prior shipper, make sure the packaging is correct and in proper condition for transportation.

#### STEP 7 - MARK THE PACKAGING (INCLUDING OVER-PACKS)

- A. Apply the required markings (Sec. 172.300); Proper shipping name and ID number, when required (Sec. 172.301); Name and address of Consignee or Consignor (Sec. 172.306).
- B. For details and other required markings, See Sections 172.300 through 172.338.

#### STEP 8 - PREPARE SHIPPING PAPERS

- A. The basic requirements for preparing shipping papers include: Proper Shipping Name; Hazard Class; ID Numbers; Total Quantity; Shipper's Certification.
- B. Make all entries on the shipping papers using the information required and in proper sequence (Sec. 172.202).
- C. For additional requirements, See Section 172.200 through 172.205.

#### STEP 9 - CERTIFICATION

- A. Each shipper must certify by printing (manually or mechanically) on the shipping papers that the materials being offered for shipment are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable DOT Regulations (Sec. 172.204).
- B. For surface shipment, See Section 172.204(a) and (b); for air shipments, see Sec. 172.204(c).

#### STEP 10 - LOADING, BLOCKING AND BRACING - When loading hazardous materials into the transport vehicle or freight container, each package must be loaded, blocked and braced in accordance with the requirements for the mode of transport.

- A. If the shipper loads the freight container or transport vehicle, the shipper is responsible for the proper loading, blocking and bracing of the materials.
- B. If carrier personnel do the loading, the carrier is responsible.

#### STEP 11 - DETERMINE THE PROPER PLACARD(S) - Each person who offers hazardous materials for transportation must determine that the placarding requirements have been met.

- A. For Highway, unless the vehicle is already correctly placarded, the shipper must provide the required placard(s) and required identification number(s) (Sec. 172.506).
- B. For Rail, if loaded by the shipper, the shipper must placard the rail car if placards are required. (Sec. 172.508).
- C. For Air and Water shipments, the shipper has the responsibility to apply the proper placards.

#### STEP 12 - HAZARDOUS WASTE/HAZARDOUS SUBSTANCE

- A. If the material is classes as a hazardous waste or hazardous substance, most of the above steps will be applicable.
- B. Pertinent Environmental Protection Agency Regulations are found in the Code of Federal Regulations, Title 40, Part 262.

*"It is the duty of each person who offers hazardous materials for transportation to instruct each of his officers, agents, and employees having any responsibility for preparing hazardous materials for shipment as to the applicable regulations..." (Section 173.1(b))*

This means that shippers are required to make certain that those officers, agents and employees who have any responsibility for preparing or offering hazardous materials for

transportation are thoroughly instructed concerning the regulations as they apply to their job functions.

**NOTE:** The following suggestions will help to comply with this requirement:

1. Identify all personnel who have hazardous materials transportation responsibilities.
2. Determine what additional instruction or training each needs.
3. Assure that those needing instruction receive it.
4. Maintain record of training.
5. Periodically review training needs in order to maintain the required expertise.

AS A FINAL CHECK AND BEFORE OFFERING THE SHIPMENT FOR TRANSPORTATION, VISUALLY INSPECT YOUR SHIPMENT.

**IMPORTANT:** EFFECTIVE DECEMBER 31, 1990, ALL DOT SHIPPING PAPERS FOR HAZARDOUS MATERIALS AND WASTE REQUIRE THE "EMERGENCY RESPONSE TELEPHONE NUMBER" ON THE FACE OF THE DOCUMENT, AND THE EMERGENCY RESPONSE INFORMATION.