

How to Avoid the 5 Most Common Shipping Paper Mistakes



Executive Summary

Hazmat shipping papers require a basic description of the material; an indication of the total quantity, and number and types of containers; emergency response information; as well as additional communications when applicable. Small mistakes in the entries of these required elements may result in costly delays, or fines and penalties from the Department of Transportation (DOT).

Let's take a look at the most common mistakes on hazmat shipping papers, and how to avoid these pitfalls.

Mistake #1: Using an Incorrect Proper Shipping Name

The DOT specifies exacting requirements for selecting a Proper Shipping Name (PSN). It must come from column 2 of the 49 CFR 172.101 table. An allowable name will be indicated in Roman type on the table and it must be accurate and specific. Although it may seem reasonable to use a commercial or common name for a product, if it's not one of the 3,000 allowable names on the table, it is illegal to do so. For example: calling a product "heavy duty drain cleaner" instead of sodium or potassium hydroxide; or describing a pesticide as rat poison or rodent pellets is incorrect.

49 CFR 172.101 - Hazardous Materials Table									
Sym-bols (1)	Hazardous materials descriptions and proper shipping name (2)	Hazard class or Division (3)	Identifica-tion Numbers (4)	PG (5)	Label codes (6)	Special provisions [§172.102] (7)	(8) Packaging [§173.***)		
							Excep-tions (8A)	Non-bulk (8B)	Bulk (8C)
A	<i>Accelerene, see p-Nitrosodimethylaniline</i>								
	<i>Accumulators, electric, see Batteries, wet etc.</i>								
	<i>Accumulators, pressurized, pneumatic or hydraulic (containing non-flammable gas) see Articles pressurized, pneumatic or hydraulic (containing non-flammable gas)</i>								
	Acetal	3	UN1088	II	3	IB2, T4, TP1	150	202	242
	Acetaldehyde	3	UN1089	I	3	A3, B16, T11, TP2, TP7	None	201	243
	Acetaldehyde ammonia	9	UN1841	III	9	IB8, IP3, IP7, T1, TP33	155	204	240
	Acetaldehyde oxime	3	UN2332	III	3	B1, IB3, T4, TP1	150	203	242
	Acetic acid, glacial or Acetic acid solution, with more than 80 percent acid, by mass	8	UN2789	II	8, 3	A3, A6, A7, A10, B2, IB2, T7, TP2	154	202	243
Acetic acid solution, not less than 50 percent but not more than 80 percent acid, by mass	8	UN2790	II	8	A3, A6, A7, A10, B2, IB2, T7, TP2	154	202	242	

Mistake #2: Inserting Extra Information in the Basic Description or Omitting A Required Element

The "basic description" of the material consists of four elements – and they must be in this order: UN/NA identification number, PSN, hazard class (subsidiary hazard class in parenthesis when applicable), and packing group (indicated in Roman numerals). The regulations clearly state that, with few exceptions, the shipper may not insert additional information into this sequence. Many companies mistakenly add product names, SKU numbers, and package quantities within the description.

Conversely, technical constituent names are commonly omitted:

When the letter "G" is in column 1 of the 49 CFR 172.101 table, this means the "generic" PSN must be supplemented with the technical name of the constituent (or at least two, if there are more) that predominantly contribute to the hazard of the material. The constituent name(s) should be entered in parentheses either after the Proper Shipping Name or following the basic description. One example of this is "Flammable liquid n.o.s. (acetone, toluene)."

This extra communication requirement to add technical names also applies to materials which are hazardous substances or marine pollutants, if the Proper Shipping Name itself does not identify the chemical [49 CFR 172.203].



Mistake #3: Not Identifying Hazardous Substances

According to penalty citations, many companies omit the technical name and forget to add the letters “RQ” for hazardous substance shipments. This information is required when a single package contains a reportable quantity (RQ) (or more) of a hazardous substance. If this is the case, the letters “RQ” can be placed either before the basic description, after the basic description, or in the optional HM (hazmat) column.

This information is required because these packages contain an amount of hazardous substance which, if released to the environment in an accident or spill, would require notifying the National Response Center.

APPENDIX A TO 49 CFR 172.101—LIST OF HAZARDOUS SUBSTANCES AND REPORTABLE QUANTITIES

Table 1—Hazardous Substances Other Than Radionuclides

Hazardous Substance	Reportable Quantity (RQ) Pounds (Kilograms)
A2213	5000 (2270)
Acenaphthene	100 (45.4)
Acenaphthylene	5000 (2270)
Acetaldehyde	1000 (454)
Acetaldehyde, chloro-	1000 (454)
Acetaldehyde, trichloro-	5000 (2270)
Acetamide	100 (45.4)
Acetamide, N-(aminothiosomethyl)-	1000 (454)
Acetamide, N-(4-ethoxyphenyl)-	100 (45.4)
Acetamide, N-9H-fluoren-2-yl-	1 (0.454)
Acetamide, 2-fluoro-	100 (45.4)
Acetic acid	5000 (2270)
Acetic acid (2,4-dichlorophenoxy)-, salts & esters	100 (45.4)
Acetic acid, ethyl ester	5000 (2270)
Acetic acid, fluoro-, sodium salt	10 (4.54)
Acetic acid, lead(2+) salt	10 (4.54)
Acetic acid, thallium(1+) salt	100 (45.4)
Acetic acid, (2,4,5-trichlorophenoxy)-	1000 (454)
Acetic anhydride	5000 (2270)

Mistake #4: Listing Domestic Emergency Response Telephone Numbers on International Shipments

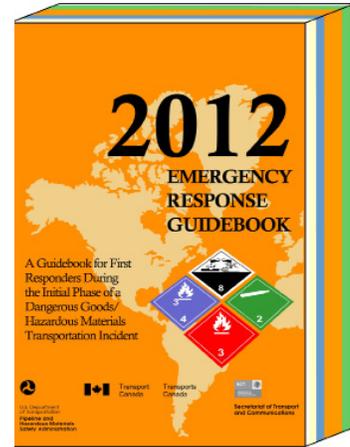
Most hazmat shipping papers require an emergency response telephone number. In case of emergency, someone who has detailed knowledge of the hazards of the materials, and who can substantially assist in emergency response operations, must be ready to answer the call the entire time the package is in transit. This is the responsibility of the shipper and if any part of this system fails to operate correctly, especially during a hazmat incident, there could be serious consequences for the Emergency Medical Technicians (EMTs), first responders, police officers and fire fighters. [49 CFR 172 subpart G].

Lately, there have been several incidents where international shipping papers contained emergency response phone numbers which begin with “1-800.” Toll free numbers like this are only useful within the U.S. On international shipping papers, these numbers must begin with the extension needed to contact the international operator and connect to the U.S. If you contract with another company to respond to these calls for you, you’ll need to list their international phone number.



Mistake #5: Forgetting to Include the Basic Description on Emergency Response Information

One final item must be addressed that causes problems for all involved, and that's the emergency response information. This information must be printed on or be with the shipping papers and is required for most hazardous material shipments. The first element required on emergency response information is the full basic description. If the shipper uses a modified safety data sheet or a modified page from the current emergency response guidebook, the full basic description would likely need to be added. This is often omitted, and if the shipment contains several different hazards not clearly identified on the emergency response information sheets, it can create multiple problems [49 CFR 172 subpart G].



Avoid Shipping Paper Penalties

These errors and omissions are some of the most common mistakes connected to shipping papers. Shippers are required to retain hazmat shipping papers for two years (or three years for hazardous waste manifests) and they must be available for inspection. Whether things are misspelled, the math is wrong, the quantities are wrong, or the order of the basic description is out of compliance, they all get the attention of the regulators and are subject to fines.



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