

**HAZARDOUS MATERIAL (HAZMAT) PACKAGING AND SHIPPING GUIDE
FOR TRANSPORTATION BY PUBLIC HIGHWAY ONLY**

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1.0 GENERAL

- 1.01 This guideline details procedures to be followed by Southwestern Bell Telephone Company personnel at company warehousing facilities when preparing hazardous material (Hazmat) for transportation **by public highway only**.
- 1.02 When this practice is reissued, the reason for reissue will be stated in this paragraph.

2.0 PURPOSE

- 2.01 The US Department of Transportation (DOT) regulates all Hazmat shipped by public highway, air, rail and water. **These guidelines apply solely to items shipped by public highway only. For shipments by other modes of transportation (air, rail or water) contact the Manager-Disposition Support on 314-235-2415.**
- 2.02 Guidelines detailed in this practice will enable Company personnel to Package, Mark, Label and Ship DOT regulated Hazmat incidental to SWBT operations. See Exhibit 1, A through G, DOT Requirements, for a list of regulated items by Product Identification Code (PID) of items found in the Procurement Catalog.
- 2.03 When there is a question about the Packaging, Marking, Labeling or Transportation of DOT regulated items, questions should be referred to the Manager-Disposition Support at 314-235-2415.
- 2.04 All of the Hazmat referred to in this practice is classified as a "Material Of Trade" when it is being transported on an SWBT company vehicle. A Material of Trade is exempt from and not subject to the same regulations that were used to produce this practice. This exemption does not apply when shipping Hazmat on non-SWBT Company vehicles. All Drivers of SWBT company vehicles should see OP 28, Package 25A Hazardous Communication, for information on a Material of Trade. Refer all questions about Hazmat or a Material of Trade to your Market-Area Safety Manager at 800-281-0936, or to the Manager-Disposition Support at 314-235-2415.
- 2.05 Also included in this practice is a checklist to be used to verify compliance to the DOT Hazardous Materials Regulations (HMR).

NOTE: Failure of an employee to comply with DOT Regulations can result in the prosecution of that employee and the company, by the US Department of Transportation. Conviction for noncompliance to the HMR, can result in fines and/or imprisonment for the employee as well as fines for the company.

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3.0 DEFINITIONS

- 3.01** Definitions marked with an arrow (è) are from 49-Code of Federal Regulations (CFR), §171.8, Department of Transportation's (DOT's) Hazardous Materials Regulations (HMR).
- 3.02** è **BOX:** means a packaging with complete rectangular or polygonal faces, made of metal, wood, plywood, reconstituted wood, fiberboard, plastic, or other suitable material.
- 3.03** è **CARRIER:** A person (or company) engaged in the transportation of property.
- 3.04** **CHEMTREC:** Is an organization set up by the chemical industry to provide Emergency Responders information during a Hazardous Materials accident or incident. SWBT has contracted with CHEMTREC to provide 24 hour, 7 day emergency response information, which is required by the DOT. CHEMTREC'S toll free number 1-800-424-9300 is pre-printed on SWBT form SW6152, Straight Bill Of Lading.
- CHEMTREC** is only for the use of first responders (fire department, police, emergency response teams, etc.) to a hazardous materials accident or incident. Do not call CHEMTREC with questions about hazardous materials. When you have a question about hazardous materials contact local safety personnel or the Manager-Disposition Support at 314-235-2415.
- 3.05** è **CLOSURE:** A device that closes an opening in a receptacle (for example: a cap on a bottle).
- 3.06** **CFR:** Code Of Federal Regulations.
- 3.07** **CONSIGNEE:** The company or the person named on the bill of lading as receiver of the material shipped.

- 3.08 CONSIGNOR:** The company or the person named on the bill of lading as the shipper of material.
- 3.09 è CONSUMER COMMODITY:** means a material that is packaged and distributed in a form intended or suitable for sale through retail sales agencies or instrumentality's for consumption by individuals for purposes of personal care or household use.
- 3.10 DOT:** The US Department of Transportation.
- 3.11 EMERGENCY RESPONSE GUIDEBOOK (ERG):** SEE NORTH AMERICAN EMERGENCY RESPONSE GUIDEBOOK (NAERG).
- 3.12 è GROSS WEIGHT:** The weight of a packaging plus the weight of its contents.
- 3.13 è HAZARD CLASS:** means the category of hazard assigned to a hazardous material by the DOT. A material may meet the defining criteria for more than one hazard class but is assigned to only one hazard class.
- 3.14 è HAZARDOUS MATERIAL (HAZMAT):** A substance or material, which has been determined by the Secretary of Transportation to be capable of posing an unreasonable risk to health, safety, and property when transported in commerce, and which has been so designated. The term includes hazardous substances, hazardous wastes, marine pollutants, and elevated temperature materials as defined by 49 CFR. The term also includes material that meets the defining criteria for hazardous classes and divisions in §173 of 49 CFR. (A complete list of regulated materials shipped by the MDC can be found in Exhibit 1, A through G, DOT Requirements.)
- 3.15 HAZARDOUS MATERIAL REGULATIONS (HMR):** DOT Hazardous Material Regulations regulate shipping and transporting hazardous materials in commerce. The HMR can be found in section 49, CFR (Code of Federal Regulations), §100 through §180.

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- 3.16 è HAZMAT EMPLOYEE:** A person who is employed by a Hazmat employer and who in the course of employment directly affects hazardous materials transportation safety. Hazmat employees include persons who:
- Load, unload, or handle hazardous materials;
 - Prepare hazardous materials for transportation;
 - Are responsible for safety of transporting hazardous materials; or
 - Operate a vehicle used to transport hazardous materials.
- 3.17 è HAZMAT EMPLOYER:** A person who uses one or more of its employees in connection with transporting hazardous material in commerce or causing hazardous materials to be transported or shipped in commerce.
- 3.18 è HERMETICALLY SEALED:** means closed by fusion, gasketing, crimping, or equivalent means so that no gas or vapor can enter or escape. Examples of hermetically sealed items are aerosols cans such as spray paints, cleaners, etc. and pressurized cylinders such as Mapp gas or liquid propane (LP) tanks.
- 3.19 LABEL:** DOT required labels are diamond shaped, square on end, and must be placed on package so that the writing on the label reads left to right and is horizontal. Labels are 3.9 inches (100 mm) on each side and are used to identify the type of Hazmat contained in a package. Labels are also required to be a certain color and contain other attributes. Use of commercially available labels is recommended.
- 3.20 è MARKINGS:** A descriptive name, identification number, instructions, cautions, weight, specification, or UN Marks, or combination thereof, required by 49-CFR on outer packaging of Hazmat.
- 3.21 MATERIALS DISTRIBUTION CENTER (MDC):** The Procurement warehousing facility used to consolidate stock material for the company.

- 3.22 MATERIAL OF TRADE:** When transporting certain Hazmat on an SWBT company vehicle, the Hazmat may be classified as a Material of Trade. The DOT exempts a Material of Trade from most parts of the HMR. This exemption does not apply to Hazmat that is shipped on a non-SWBT Company vehicle from a company warehouse facility. See, OP 28, Package 25A Hazardous Communications, for details on Materials of Trade.
- 3.23 NA:** North America.
- 3.24 NORTH AMERICAN EMERGENCY RESPONSE GUIDEBOOK (NAERG) or EMERGENCY RESPONSE GUIDEBOOK (ERG):** The NAERG or ERG was designed for use by fire-fighters, police officers, and other emergency response personnel responding to a hazardous materials incident. The information it contains can be useful in similar type incidents at warehouses, terminals and in the work place. The NAERG and ERG provide information concerning the appropriate action to take when there is a spill or leak, fire or other hazardous material incident. Information contained in the guidebook includes: fire and explosion; health; public safety; protective clothing; evacuation; fire; spill or leak; and first aid. The NAERG was put together by the governments of Canada, Mexico and the US for use in NA, it replaced the ERG (from the US DOT) in 1996.
- 3.25 è N.O.S.:** Not Otherwise Specified.
- 3.26 ORIENTATION ARROWS:** DOT marking used to show the correct orientation of a package. Orientation arrows are required on liquid hazardous materials however they may be used on any package. Orientation arrows must be placed on two opposite vertical sides of a package in the correct upright position. (See Exhibit 1, A through G, DOT Requirements.)
- 3.27 è ORM:** Other Regulated Material, i.e., material such as consumer commodities, which although otherwise subject to regulation presents a limited hazard during transportation due to form, quantity and packaging.
- 3.28 è OVERPACK:** An enclosure that is used by a single consignor to provide protection or convenience in handling of a package or to consolidate two or more packages (for example, material stacked on a pallet and then wrapped with shrink-wrap).

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- 3.29 **è PACKAGE:** A packaging plus its contents.
- 3.30 **è PACKING GROUP:** A grouping according to the degree of danger presented by Hazmat. Packing Group I indicates great danger, Packing Group II, medium danger, Packing Group III, minor danger. Packing Groups **must be** written in ROMAN NUMERALS. (for example, I, II or III, not 1, 2 or 3.)
- 3.31 **PRODUCT IDENTIFICATION CODE (PID):** Used to identify products listed in the Procurement Catalog. PIDs contain 9 digits.
- 3.32 **è PROPER SHIPPING NAME:** The name of the Hazmat shown in Roman print in the Hazardous Materials Table, in 49-CFR.
- 3.33 **SHIPPER:** The person offering material or goods for transportation.
- 3.34 **è SHIPPING PAPER:** A shipping order, bill of lading, manifest or other shipping document serving a similar purpose and containing the information required by 49-CFR. SWBT uses Form SW 6152, Bill of Lading, for a shipping paper.
- 3.35 **è STRONG OUTSIDE CONTAINER:** The outermost enclosure which provides protection against the unintentional release of its contents under conditions normally incident to transportation.
- 3.36 **è TECHNICAL NAME:** A recognized chemical name or microbiological name currently used in scientific and technical handbooks, journals, and texts.
- 3.37 **è TRANSPORT VEHICLE:** A cargo carrying vehicle such as an automobile, van, tractor, truck, semi-trailer, etc. used for the transportation of cargo by public highway.
- 3.38 **UN:** United Nations.

4.0 DOT REQUIREMENTS FOR HAZMAT SHIPMENTS:

A. Packaging:

- 4.01 When packaging Hazmat for shipment, only the proper UN specification packaging required by 49-CFR may be used (See Exhibit 2, Identifying UN Approved Fiberboard Boxes). The UN Specification Markings can be found on the bottom of the box. New boxes or clean undamaged used boxes may be used for packaging Hazmat. Hazmat packaging **may not** contain any graphics, logos, printing, or any other marks that will interfere, cover, or distract from the effectiveness of the required DOT markings or labels. Arrows, other than orientation arrows when required, may not be printed on or attached to any package of Hazmat. See Exhibit 1, A through G, DOT Requirements.
- 4.02 Items ready to be packaged should be stored in the warehouse in an orderly manner. Any Hazmat items which are damaged or leaking should not be packaged or shipped. Hazmat spills should be cleaned up immediately and the State Environmental Coordinator must be notified at 1-800-854-5825. Non-regulated materials must not be marked or labeled as Hazmat.
- 4.03 All Hazmat items placed in a package must be secured and cushioned sufficiently to prevent damage to items while in transit or when handling. All packages of Hazmat must be closed. All liquid Hazmat must be packed with its closure in an upright position.

B. Markings:

- 4.04 All required DOT markings must be undamaged legible, visible, placed squarely on the package, and read from left to right. The Proper Shipping Name and Technical Name (when applicable) must be the proper names for the material in the package and be spelled correctly. Markings may not be covered by tape, other markings, labels, etc. See Exhibit 1, A through G, DOT Requirements, for placement of DOT Markings and Labels.

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4.05 **DOT required markings and proper placements on a package are as follows:**

1. **CONSIGNEE'S OR CONSIGNOR'S NAME AND ADDRESS** -- Must be placed on top of the package.
2. **PROPER SHIPPING NAME** -- must be the correct name for the product in the package and must be spelled correctly. The Proper Shipping Name must be placed on the front of the package in the upper left hand corner.
3. **(TECHNICAL NAME)** -- when required, must be the correct name for the product in the package, must be spelled correctly, and must be in parentheses. The technical name must be placed on the front of the package immediately following the Proper Shipping Name.
4. **UN or NA NUMBER** -- must be for the product in the package and include the appropriate prefix UN or NA. The proper UN or NA Number must be on the front of the package immediately following the Proper Shipping Name or the Technical name.
5. **ORM-D, CONSUMER COMMODITY** -- Must be placed on the front of the package.
6. **ORIENTATION ARROWS** -- When required, on liquid Hazmat, must be placed on two opposite vertical sides of the package in the correct upright position. (Front and Back **or** Left and Right). No other arrows may be printed on or affixed to any package of Hazmat.
7. **INNER PACKAGES COMPLY WITH PRESCRIBED SPECIFICATIONS** -- Marking must be on the front of the package.

C. Labels:

- 4.06 All DOT required labels are diamond shaped and must be placed on the package "square on point" so that the label reads left to right. Labels must be placed on the front of a package near the proper shipping name when space is sufficient. When space is insufficient to place label on the front of the package, label may be placed on the right hand side of the package or on a tag affixed to the package. Labels must be completely visible and may not be covered by any tape, markings other labels, etc. See Exhibit 1, A through G, DOT Requirements for Placement of DOT Markings and Labels.

- 4.07 Carriers must have an adequate supply of labels to replace those that become lost or destroyed. The carrier shall replace each lost or destroyed label based on the information on the shipping paper.

D. Overpacks (Pallets):

- 4.08 Overpacks include packages stacked on pallets and then wrapped with shrink-wrap. When a package containing Hazmat is placed on a pallet, a sample of all DOT required Markings and Labels must be visible on the outside of the overpack (through the shrink-wrap). It is recommended that all packages containing Hazmat be placed on pallet with DOT Markings and Labels turned to the outside of the pallet prior to any shrink-wrap being applied.

E. Shipping Papers (Bill Of Lading):

- 4.09 SWBT uses Form SW6152, Bill of Lading (See SWBT Practice SW 744-001-901, Preparation and Distribution of Bills of Lading) as a shipping paper. This form is preprinted with Proper Shipping Name, Technical Name, UN or NA ID Number, Hazardous Class and Packaging Group as required by the DOT, for regulated items found in the Procurement Catalog. Only use pre-printed items for the products for which they are intended. Also preprinted on form SW6152 is the Emergency Response Telephone Number and the Required Certification. Shipping papers cannot contain any required Hazmat entries for any non-hazardous items.
- 4.10 All shipping paper entries must be spelled correctly, must be legible and must be complete. Packing Groups are not required for Hazardous Classes 2 or 7.
- 4.11 DOT requirements for a shipping paper that contains Hazmat include the following:
1. Proper Shipping Name, (See item 5);
 2. Hazard Class;
 3. UN or NA Identification Number;
 4. Packing Group (if any);

Note: Items 1 through 4 must be in sequence. (See item 5);

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5. Technical Name, when required, must be in (parentheses), immediately following the Proper Shipping Name;
6. Quantity of material;
7. Certification and Signature (Signature must be legible and may be printed, either manually or mechanically);
8. Entry for multiple page shipping paper (continuation entries) should include: page 1 of 1; 1 of 2; 2 of 2; etc.; and
9. An **"X"** must be placed before the Proper Shipping Name in the Hazardous Material column captioned "HM" (do not use checks or other marks in this column).

F. Shipping Papers (Placards):

- 4.12 It is the **shipper's responsibility** to provide placards when offering Hazmat for transportation.
- 4.13 Placards are not required when shipping Hazmat classified as ORM-D. When providing placards, offer four (4) of each placard, one for the front, one for the rear and one for each side of the transport vehicle.
- 4.14 Space has been provided on SWBT Form SW6152, Bill of Lading to indicate when placards have been offered to a carrier.
- 4.15 When offering one class of Hazmat (do not use ORM-D items) for shipment offer placards if the weight of the Hazmat is 454 Kilograms (1,001 Pounds) or more. Complete the proper entry on the Bill of Lading.

- 4.16 When offering more than one class of Hazmat for shipment determine the gross weight of all Hazmat in a shipment, regardless of classification (do not use ORM-D items). Offer placards (See Exhibit 1, A through G, DOT Requirements, for the type of placards required), to the carrier and record the offer on the Bill of Lading, as follows:
- When offering less than 454 Kilograms (1,001 Pounds) of Hazmat for transportation placards are not required. No entry for placards needs to be made on the bill of lading.
 - When offering from 454 Kilograms (1,001) Pounds up to 1,000 Kilograms (2,205 Pounds) of Hazmat, for transportation, Dangerous placards or placards for each Hazardous Class must be provided and entered on the bill of lading.
 - When offering 1,000 Kilograms (2,205 Pounds) or more of Hazmat, for transportation, four placards must be provided for each Hazardous Class. Also complete the proper entries on the bill of lading.

G. Shipping Papers (Emergency Response Information):

- 4.17 The DOT requires persons who offer Hazmat for transportation to maintain and provide carrier with two types of Emergency Response Information, i.e., information that can be used in mitigation of incident involving Hazmat.
- 1) Basic Emergency Response Information; and
 - 2) Emergency Response Telephone Number;
- 4.18 Both forms of emergency response information must always be immediately available, for use, in case of accident or incident, when Hazmat is present. This requirement applies to any facility where Hazmat is received, stored or handled during transportation. Basic Emergency Response Information must be available away from the hazardous material. This information must be written in English. The shipper of the Hazmat must supply the required Emergency Response Information to the carrier.

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- 4.19 Basic Emergency Response Information must contain the following information for each product in a shipment:
1. Basic description and technical name;
 2. Immediate hazards to health;
 3. Risk of fire or explosion;
 4. Immediate precautions to be taken in the event of an accident or incident;
 5. Immediate methods for handling fires;
 6. Initial methods for handling leaks in the absence of fire; and
 7. Preliminary first aid measures.
- 4.20 The NAERG, contains the above information and may be used to comply with the general Emergency Response Information requirement. The NAERG must contain all pages related to the material being shipped.
- 4.21 Space has been provided on SWBT Form SW6152 to indicate if a carrier has a current and complete copy of the NAERG. If the driver does not have a current NAERG or if the NAERG is missing any pages an MSDS Sheet or NAERG must be given to the driver with the shipping papers.
- 4.22 The second Emergency Response Information requirement is the Emergency Response Telephone Number. The Emergency Response Telephone Number must be:
- Printed on the shipping paper (SWBT Form SW6152, Bill of Lading has an Emergency Response Telephone Number preprinted);
 - Answered 24 hours a day, 7 days a week. (The telephone number printed on SWBT Form SW6152, Bill of Lading is the telephone number of the Chemical Transportation Emergency Center (CHEMTREC), see note); and
 - Able to provide immediate emergency information about the Hazmat being transported.

NOTE: SWBT has a contract with CHEMTREC to use their Emergency Response Services. CHEMTREC is an organization created by the chemical industry to provide emergency response information for the chemical and trucking industry. CHEMTREC is the largest company of this type in the US.

WARNING: CHEMTREC IS FOR EMERGENCIES USE ONLY.

Do not use CHEMTREC for routine questions about Hazmat.

This type of question should be referred to:

Manager-Disposition Support at 314-235-2415.

NOTE: CHEMTREC may be used for spills or accidents on loading docks or in warehouses.

H. Training (HM-126-F) Requirements:

- 4.23 DOT Hazmat training requirements can be found in Operating Practice 28, Package 25C. The DOT requires that all Hazmat Employers train, test and then certify that the training and testing have been completed for each Hazmat Employee. OP 28 Package 25C contains a certification that must be completed and placed in all Hazmat Employees personnel binders. Training is required to be completed every 3 years. Management employees that supervise Hazmat employees are also required to meet the training, testing and certification requirements.

5.0 INSPECTING HAZARDOUS MATERIAL SHIPMENTS

- 5.01 This section contains a checklist that may be used to review compliance to DOT Hazmat Requirements. Findings, items found to be correct as well as defects, should be recorded on the Hazmat Shipping Inspection Sheet, See Exhibit 3, Hazmat Shipping Inspection Sheet.
- 5.02 The Manager-Disposition Support will conduct an annual compliance review of company warehouse facilities which ship Hazmat. The results will be reported to the manager in charge of the facility reviewed and to the Company Federal Motor Carrier Safety Regulation (FMCSR) Committee Chairperson, for corrective action. All warehouse managers are responsible for Hazmat in their respective areas and will conduct periodic inspections of their areas and assure compliance with regulations.

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A. Packaging:

1. Is Hazmat well organized in the warehouse?
2. Is there any Hazmat on the shelves that is leaking or damaged?
3. Does packaging meet UN Specifications? (UN specification markings can be found on the bottom of the package.)
4. What is the condition of package? Check for visible signs of damage, is the package crushed; are there any holes; tears; are there signs that the package is leaking; etc.?
5. Has liquid Hazmat been placed into the package with their closure in an upright position?
6. Have the contents of the package been cushioned and secured properly?
7. Does the Package contain any graphics, printing, marks, labels, etc. that could interfere with the effectiveness of required DOT markings or labels?
8. Are any packages labeled or marked as Hazmat, which do not contain Hazmat?

B. Markings:

9. Has the proper UN Specification Packaging been used? UN Specification Markings can be located on the bottom of the package.
10. Are all markings the proper markings for the items in the package?
11. Have the Proper Shipping Name and the Technical Names been spelled correctly?
12. Is the Technical Name in parentheses?
13. Have the proper UN or NA ID numbers been used for product being shipped?
14. Does the UN or NA ID Number include the prefix?
15. Are all markings properly placed on the package?
16. Are Markings visible and legible?
17. When Orientation Arrows are required, were they placed on two opposite vertical sides of the package?
18. Are Orientation Arrows in the correct upright position?

- 19. Are there any unauthorized markings on the package?
- 20. Have any markings been covered by tape, labels, other markings?

C. Labels:

- 21. Was proper label used for item(s) in the package?
- 22. Is label properly positioned and placed on the package, near the proper shipping name?
- 23. What is the condition of Label, (e.g., is it torn, missing or damaged)?
- 24. Are there any unauthorized labels on the package?
- 25. Are there any graphics, marking labels, tape, printing, etc., covering or interfering with the effectiveness of the label?

D. Overpacks (Pallets):

- 26. Are markings and labels on packages of Hazmat visible?
- 27. Have all packages of Hazmat on the pallet been properly packaged, marked and labeled?

NOTE:	Do not remove shrink-wrap or open packages of Hazmat unless there are visible signs that a package is damaged or leaking and needs to be repackaged.
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E. Shipping Papers (Bill Of Lading):

- 28. Is the shipping paper for this shipment a current SWBT Form SW6152, Bill of Lading?
- 29. Are there entries for all Hazmat items being shipped?
- 30. Are all entries complete and legible?

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31. Does the "HM" column contain an "X" for the proper Hazmat items shipped in this shipment? Only an "X" is used in the "HM" column?
32. Are there entries for continuation page, 1 of 1, 1 of 2, 2 of 2, etc.?
33. Is there a complete name and address in the Consigned To section of the shipping paper?
34. Is there a complete name and address in the Shipper's section of the Bill of Lading?
35. Has the certification been signed; and if so, is it legible (may be printed, typed, stamped, etc.)?
36. Is there an entry for placards (only required when a Hazmat shipment weighs 454 Kilograms (1,001 Pounds) or more)?
37. Has the number of packages been entered in the No Pkgs. column?
38. Has the kind of package(s) been entered, (box, drum, bag, pallet, etc.)?
39. In the Weight column, has the gross weight of each Hazmat item been entered?
40. Has the total weight of Hazmat been entered?

F. Shipping Papers (Placards):

NOTE: Entry is only required When 454 Kilograms (1,001 Pounds) or more of Hazmat is offered for transportation on one shipment.

41. Were placards offered to the carrier with this shipment?
42. Was the offer of placards noted on the Bill of Lading?

G. Shipping Papers (Emergency Response Information):

43. Are there NAERGs available for use in the warehouse?
44. Can Supplies Attendants locate them immediately?
45. Can the driver that is transporting Hazmat produce a copy of an NAERG?

- 46. Has entry been made on the Bill of Lading for all Hazmat shipments that the carrier's NAERG was inspected and/or replaced?
- 47. Does Bill of Lading contain CHEMTREC's Telephone Number? (Preprinted on SWBT Form SW6152.)

H. Training:

- 48. Are the certifications available for all Supplies Attendants working in the packaging, shipping, or returns areas of the warehouse? (This would include people loaned to these areas on occasion)
- 49. Are the certifications current (within previous 36 months)?
- 50. Are certifications available for the Supervisors over these areas of the warehouse?

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