



Advisory – Shipping Paper Changes

March 18, 2013

TO: APA Members

SUBJECT: Important Compliance Instructions for Industry Shipping Papers

As discussed during the Winter Educational Conference in Las Vegas last month, we recently learned that common industry practices in preparing shipping papers may not be accurate nor comply with the letter of the law. In particular, the common practice of attaching a 'packing list' identifying all of the EX numbers covered in a shipment.

One of the most frequently cited safety violations of the Hazardous Materials Regulations is the failure to properly describe the hazardous materials on the shipping papers. Thus, with the busy 4th of July season just around the corner, please note the following, to ensure that your shipping papers are in compliance with the DOT regulations:

Basic Description

Effective January 2013, the order of the information required under the Basic Description has changed and must be presented precisely in the following order:

1. Identification Number (this is the UN number)
2. Proper Shipping Name (Fireworks or other product name)
3. Hazard Class or Division (1.4G, 1.3G, etc.)
4. Packing Group (if applicable) (PG II usually for fireworks shipments)

DOT uses the acronym "ISHP" to assist you in remembering the components and new order of the Basic Description.

Hazmat Shipments – Additional Information

Hazardous materials offered in the shipment must be identified first and entered in a color that clearly contrasts with any description on the shipping paper of non-hazmat materials. Additionally, all hazmat must be identified on the paper by entering an "X" before the shipping description in a column captioned "HM". It is also important that you convey the net explosive mass in KG or pounds on your shipment. Gross weight is optional for ground transportation.

The above two areas of the shipping paper are fairly straightforward and we believe members of the industry are comfortable with these requirements and routinely convey this information accurately on shipping papers. However, the issue of concern is accurately presenting the required information with regard to the EX numbers offered in the shipment.

EX Numbers

EX numbers for all products offered in a shipment may be either marked on the shipping cartons or listed on the shipping paper.

If you opt to list the EX numbers on the carton, you only need to identify 5 of the EX numbers in the carton, however, those 5 EX numbers identified must be in the carton.

If you opt to list the EX numbers on the shipping paper, the EX numbers must be listed immediately after the Basic Description entry for that material on the shipping paper (e.g., UN0335, 1.3G, PGII, EX Numbers: 1988070151, 1990010021, 19900010045, etc.).

The challenge for many companies is the volume of EX numbers covered in each shipment and many companies have opted in the past to attach a packing list describing all EX numbers covered by the shipment. While this has been a long-standing practice (and acceptable to many local, state and federal regulators), officials at DOT have alerted the APA that this is not technically correct. Accordingly, we believe fireworks industry shipping papers will be high on the targeted enforcement list of items for inspectors to focus on this season.

In lieu of the packing list, a company can, however, have a multi-page shipping paper, provided each page is consecutively numbered and the cover page contains a notation specifying the total number of pages, including the cover shipping paper. For example, "Page 1 of 3 pages". We believe this is the best solution for most fireworks companies.

We circulated the attached shipping paper by DOT for review and they have indicated that our example is in compliance with both the spirit and letter of the law.

If you use pre-printed shipping papers, you may wish to contact Gregg Smith at Gsmith@americanpyro.com to make certain that your shipping papers will comply. We would encourage companies to avoid pre-printed forms if possible (as they are easily prone to error) and to consider purchasing a software package –such as the one we used to develop the sample that was presented to DOT, or to use an excel program to generate your shipping papers. We have attached an excel spreadsheet that you can customize and use.

Again, it is important that your EX numbers be presented as part of the true shipping paper (utilizing consecutively numbered pages if necessary) and not be presented as an 'attached' packing list.

We hope this advisory will help you prepare for the upcoming fireworks season. If you have any questions, or require additional clarification, please contact APA's Program Safety Manager, Gregg Smith, at (724) 962-4061.

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