

Hazmat shipping papers

Navigate driver responsibilities to ensure compliance

Simple training hacks

Permanent shipping papers — The solution you didn't know you needed

Hazmat versus non-hazmat shipping papers

Information and resources to help your employees work safely with hazardous materials

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MESSAGE FROM THE EDITOR

Simple training hacks can reduce hazmat violations

I spend most of my day answering questions about hazardous materials, handling around 1,500 questions annually. Over the years, I’ve noticed that most questions on violations can be addressed through training.

When examining FMCSA’s roadside inspection violations, the top five currently include two for cargo securement, two for shipping papers, and one for placarding. All of these issues could be significantly reduced or even eliminated with effective training:

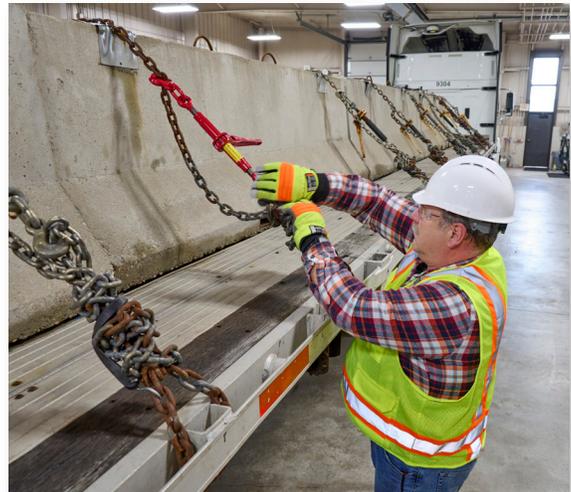
- Cargo securement,
- Shipping paper accessibility,
- Package securement,
- Missing or improper shipping papers (carrier), and
- Prohibited placarding.

I understand that training requires time and money, both of which are often in short supply in the transportation industry. So, how can we address this? By thinking

outside the box when it comes to training. Here are some cost-effective and time-efficient strategies to enhance your training program:

- **Text messages:** Send your drivers short, informative text messages with training tips. This can be done daily, weekly, or monthly. For example, if you have issues with shipping paper accessibility, you could send a text like, “Reminder: Shipping papers must be within immediate reach of the driver when they are restrained by a seatbelt,” or “Shipping papers must be readily visible to someone entering the driver’s compartment, or in a holder mounted on the inside of the driver’s door.”
- **Emails:** Send your drivers brief emails or attachments with hazmat training tidbits. These could include reminders on how to secure hazardous materials or when placards are required to be displayed.

Small, simple actions can make a big difference. By implementing these strategies, you can enhance your training program without imposing a heavy burden on your drivers or your budget. ♦



Michael Atkinson

Michael Atkinson, Editor, joined J. J. Keller & Associates, Inc., in 2016, bringing with him over two decades of experience in military logistics. His career spans a wide spectrum, encompassing operations, management, hazmat preparation, inspection, logistics, and material handling. Michael supports the PHMSA hazmat regulations for highway, air, and water, and he has experience with the international dangerous goods regulations. Michael plays a vital role in developing and updating hazmat-focused manuals, online services, forms, and handbooks. Additionally, his expertise is used in the development of innovative products, including online hazmat training.



Getting your drivers to master their shipping paper responsibilities

Understanding the requirements for transporting hazardous materials is crucial for drivers. This knowledge can prevent costly violations, which can range from hundreds to thousands of dollars. Out-of-service violations can further increase costs due to downtime and delivery delays.

According to the FMCSA's 2024 Roadside Inspection Violations statistics, two of the top five hazmat violations involved shipping papers. Specifically, there were 1,550 violations for shipping paper accessibility and 1,279 violations for missing or improper shipping papers. Given that most hazardous materials shipments require hazmat shipping papers, such as bills of lading or hazardous waste manifests, it's essential that drivers are aware of their responsibilities regarding these documents. Your drivers should know:

- What must be included on hazmat shipping papers,
- How to verify cargo against the shipping papers, and
- Where to keep the shipping papers.

Shipping paper requirements

A shipping paper is a document prepared in line with the Hazardous Materials Regulations. This term encompasses any shipping order, bill of lading, waybill, manifest, or similar document. With few exceptions, shipping papers are mandatory for each hazardous materials shipment. They provide crucial information about the contents and hazards of the shipment to all who handle it.

Shipping papers must include the following elements:

- Shipping description,
- Shipper's certification (in most cases),
- Emergency response telephone number, and
- Emergency response information (either on the shipping paper or a separate document).

TIP: Review each element of the shipping paper with your drivers.

Verify the cargo

When picking up a load, drivers should cross-reference the shipping papers with the cargo to ensure accuracy. Any discrepancies should be corrected before leaving the pick-up area, as unresolved issues may fall on the carrier.

Verifying the cargo is a fairly easy process. Drivers must ensure that all markings, labels, and placards on the cargo match the information on the shipping papers.



TIP: Use mock shipping papers and cargo for practice sessions with your drivers.

Shipping paper placement

Throughout the trip, drivers must maintain the shipping papers according to regulatory requirements, ensuring they're easily accessible to authorities during incidents, accidents, or inspections.

- **If carried with other papers:** The hazmat shipping paper must be clearly distinguished, either by tabbing it or by ensuring it appears first.
- **When the driver is at the controls:** The shipping papers must be within immediate reach when the driver is restrained by the seat belt.
- **Visibility:** The shipping papers must be readily visible to someone entering the driver's compartment or in a holder mounted on the inside of the driver's side door.
- **When not in the vehicle:** The shipping papers must be either in the holder on the door or on the driver's seat. ♦

TIP: Send your drivers reminders of where shipping papers can be placed through text or email.



TRAINING HANDOUT — SHIPPING PAPERS

Navigating driver responsibilities with shipping papers

The following are the top three responsibilities regarding hazmat shipping papers.

Shipping paper requirements

Never accept a load unless the shipping papers are correct. When reviewing the shipping papers, make sure you have the following elements:

- Shipping description,
- Shipper's certification (in most cases),
- Emergency response telephone number, and
- Emergency response information.

Verifying the cargo

You also need to cross-reference the shipping papers with the cargo to ensure everything matches. To do this:

- Find the first hazmat entry on the shipping papers;
- Find the cargo that matches the entry on the shipping paper;
- Make sure the markings, labels, and/or placards match the shipping paper; and
- Repeat until all entries have been verified.



Shipping paper placement

Keep the shipping papers in a place so they're easily accessible to authorities in the event of an incident, accident, or inspection. The shipping papers must be:

- Clearly distinguished when carried with other papers,
- Within immediate reach when you're restrained by the seat belt,
- Readily visible to someone entering the driver's compartment or in a holder mounted on the inside of the driver's side door, and
- In the holder on the door or on the driver's seat when you're not in the vehicle. ♦

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TEST YOUR KNOWLEDGE — SHIPPING PAPERS

1. Drivers shouldn't accept a hazmat load unless the shipping papers are correct.
 - A. True
 - B. False
2. Which of the following elements are on a hazmat shipping paper?
 - A. Shipping description
 - B. Shipper's certification
 - C. Emergency response telephone number
 - D. All the above
3. You should verify the cargo to ensure everything matches.
 - A. True
 - B. False
4. Drivers must keep the shipping papers accessible, so they're easily accessible to authorities in the event of an incident, _____, or inspection.
 - A. Accumulation
 - B. Accident
 - C. Construction
 - D. Deviation
5. If the driver is at the controls and restrained by the seatbelt, where should the shipping papers be kept?
 - A. In the glove box
 - B. With the cargo
 - C. Within immediate reach
 - D. In a holder on the passenger door ♦

NAME: _____ DATE: _____

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Simplify: Use “permanent” shipping papers for partial deliveries

Shipping paper requirements can be tricky for companies delivering partial loads of hazmat (liquified petroleum gas, for example) to several locations throughout the day. The driver starts with a volume of hazmat that declines as deliveries are made. The hazardous material stays the same, but the volume changes. Must a driver create a new shipping paper or revise an existing shipping paper to reflect partial delivery of a product?



Permanent shipping papers cover deliveries

Instead of using a separate shipping paper for each delivery, a carrier may use a single shipping paper, without change, for multiple shipments of one or more hazardous materials. This option, found in 172.201(e), only applies when each separate hazardous material has the same shipping name and identification number.

The answer? No. The solution? “Permanent” shipping papers.

Quantity must be indicated, except...

For transport by highway, the regulations (in 172.202(a)(5)) require that the total quantity of hazardous materials covered by the description on the shipping papers must:

- Be indicated by mass or volume (or by activity for Class 7 materials); and
- State the unit of measurement, for example, “440 pounds” or “13 gallons.”

Here’s the exception: Bulk packages don’t need the indication of mass or volume, if some indication of the total quantity is shown. For example, “1 cargo tank” or “2 IBCs.”

But how should that quantity be tracked as deliveries are made and the quantity changes throughout the day?

The document, known as a “permanent” shipping paper, allows a carrier to:

- Use a shipping paper without change for multiple shipments of one or more hazardous materials having the same shipping name and identification number; and
- Retain a single copy of the shipping paper, instead of a copy for each shipment made.

To use this option, the carrier must retain a record of each delivery made that includes:

- Shipping name,
- Identification number,
- Quantity delivered, and
- Date of shipment.

However, if a driver picks up additional quantities of hazardous materials that weren’t previously indicated on the shipping paper, the additional quantities must be added if the total quantity on the vehicle exceeds that indicated on the shipping papers. ♦

Mixed loads: How to differentiate hazmat and non-hazmat shipping papers

When hauling hazmat with non-hazardous materials, the hazmat information must be easily seen and readily available. This starts with emphasizing hazmat entries on the shipping papers and placing the hazmat shipping papers in a specific location in the vehicle.

Given that shipping paper accessibility is among the top three hazmat violations, it’s a good time to review your practices to ensure compliance.

Easy to see: Make the hazmat obvious

Shipping papers must clearly indicate hazardous materials and make the information quickly identifiable



in emergencies. While this is typically the shipper's responsibility, drivers may need to create shipping papers in certain situations and should follow these guidelines:

- Enter the hazmat description first on the shipping papers.
- Identify the hazmat entry with an "X" or "RQ" in a column designated "HM."
- Use a contrasting color for the hazmat description.

On reproduced shipping papers, highlight the hazmat description in a contrasting color.

Easy to access: Ensure they can find it

Hazmat shipping papers must be readily available and recognizable by authorities during accidents or inspections.

In the pile of documents:

- Distinctively tab the hazmat shipping paper, or
- Place the hazmat shipping paper first.

In the cab of the truck:

- Make the hazmat shipping paper visible to someone entering the driver's compartment, or
- Place the hazmat shipping paper in a holder mounted inside the driver's side door.

When the driver is at the controls, the hazmat shipping paper must be within immediate reach when restrained by the lap belt. When the driver isn't at the controls, the paper must be:

- In a holder mounted inside the driver's door, or
- On the driver's seat.

What NOT to do: Avoid placing shipping papers in a cubby above the visor or behind the seat, as these locations don't meet access requirements. ♦

Answers to quiz on page 5: A, D, A, B, C



Next Month's Topic: General loading/unloading requirements

The general loading requirements for hazardous materials, located in Part 177 of the Hazardous Materials Regulations, have several requirements hazmat employees must follow when loading and unloading vehicles. PHMSA's main goal is to keep employees safe and secure while loading or unloading vehicles with hazardous materials. ♦

Expert Help: Question of the Month

Question: We are a service company that will use hazardous material Class 8 in our services and bring back the empty containers to the warehouse. If the service technician visits three clients in a day, do they have to update the shipping paper after each client service visit? Or will there be one shipping paper on the departure route and then a shipping paper for the return trip with residue containers?

Answer: If you're making deliveries or service calls, you don't need to update the hazmat shipping papers. However, if you pick up more than what's listed on the hazmat shipping papers, you'll need to adjust them to account for the additional hazardous materials. PHMSA has a letter of interpretation that gives you a clearer explanation on that topic, 03-0247. See a portion of it below:

"A driver is not required to update a shipping paper to reflect partial delivery. However, if a driver picks up additional quantities of hazardous materials, which were not previously-indicated on the shipping paper, the additional quantities must be added if the total quantity on the vehicle exceeds that indicated on the shipping papers." ♦



Expert Help

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EDITOR: Mike Atkinson

ISSN (TBD)

GST R123-317687

(78717)



J. J. Keller & Associates, Inc.®

3003 Breezewood Lane, P.O. Box 368
Neenah, Wisconsin 54957-0368

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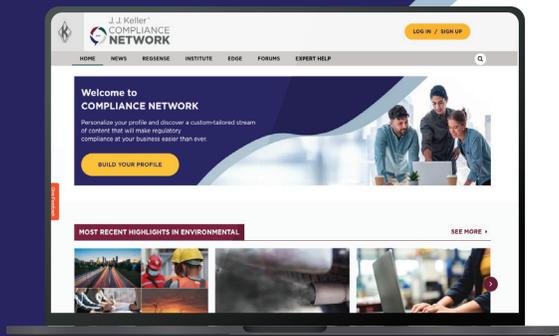
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