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Regulation

CONTINENTAL OIL COMPANY

Ponca City, Oklahoma
February 6, 1967

TO: Mr. Gordon Cain, New York
Mr. W. R. Toller, Douglas Oil Co., Los Angeles
Mr. John Powers, Western Oil & Fuel Co., Minneapolis
Mr. J. P. Mallott, Houston
Mr. R. F. Dudley, Agrico Chemical Co., Memphis
Mr. Wyatt Walker, Houston
Mr. Dean Hadfield, Houston
Mr. J. E. Barnes, Houston
Mr. Ray Smith, Thompson-Apex Co., Pawtucket, R. I.
Mr. Ed Michels, Continental Pipe Line, Ponca City
Mr. F. T. Owens, Kayo Oil Co., Chattanooga
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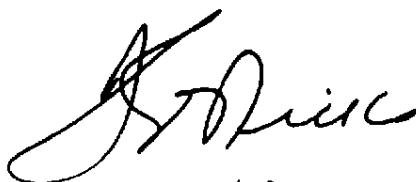
SUBJECT: FILE 514.2 - BUREAU OF EXPLOSIVES

Attached is information on new requirements of the Interstate Commerce Commission, regarding containers for explosives and other dangerous articles. The word "container" is defined to include tank trucks. The word "carriers" includes private, contract, and common carriers.

It is our suggestion that the attached draft be furnished to all of your personnel supervising the loading of tank cars and tank trucks.

The order is primarily to fix the responsibility for loading regulated materials into proper trucks. It is still the shipper's responsibility to not load into improper trucks.

The changes in bills of lading will be handled by this office.



T. E. Nicks
Director of Traffic
Transportation Department

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Copies to:

Mr. James C. Phelps, Houston
Mr. J. A. Watson, Denver
Mr. C. C. Martin, Ft. Worth

CWH 000001971

The Interstate Commerce Commission by Order No. 71 in Docket No. 3666, has ordered that section 73.22 (a) of the Interstate Commerce Commission Regulations for Transportation of Explosives and Other Dangerous Articles, be amended to read as follows:

"Section 73.22 Specifications Containers prescribed.

- (a) Where containers are supplied by the shipper, the shipper shall be responsible to determine that shipments of explosives and other dangerous articles are made in containers which, unless otherwise provided in this part (see section 73.9(c)), have been made, assembled with all parts or fittings in their proper place, and marked in compliance with applicable specifications prescribed in Parts 78 and 79 of this Chapter or with specifications of the Commission in effect at date of manufacture of container. The shipper may accept the manufacturer's certification or specification marking to determine that the containers were manufactured in accordance with applicable specifications. Where containers are supplied by the carrier, the shipper shall determine that the containers in which commodities are to be loaded are proper containers for the transportation of such commodities by examining the manufacturer's identification plate, specification marking, or certification by the carrier."

Part 78 provides specifications for all types of shipping containers including tank trucks, tank trailers, etc., while Part 79 covers tank cars or other rail cars for hauling of explosives or other dangerous articles. Section 73.9(c) covers packing or shipping containers for Import or Export shipments, and is subject to Parts 78 and 79 specifications.

To comply with these new regulations, the following certificate must either be printed on all bills of lading or on a separate certificate prepared, signed by carrier, and kept on file at each loading point for each truck shipment of dangerous articles in carriers' equipment. We plan to add the certificate on all bills of lading or loading tickets. Until this can be done, a certificate will be required.

"If carrier supplies containers, it hereby certifies that the containers in which this shipment is made have been manufactured, assembled with all parts or fittings in their proper place, and marked in compliance with applicable specifications prescribed in Parts 78 and 79 of Interstate Commerce Commission Regulations (T. C. George's Tariff I.C.C. No. 19), or such other specifications required by the Commission."

This does not replace the Shipper Certification now printed on present bills of lading and loading ticket forms.

Effective date is March 1, 1967.

CWH 000001972

TRANSPORTATION OF DANGEROUS ARTICLES

Some of you regularly ship from your plant commodities which are considered hazardous. Some of you ship these commodities only occasionally. There seems to be a trend which indicates Continental Oil Company is shipping a wider variety as well as a larger quantity of dangerous commodities.

Chairman Bush of the Interstate Commerce Commission recently estimated that 25 new commodities classified as dangerous for transportation purposes are coming on the market each day.

As shippers of dangerous articles, it is important that you be familiar with regulations governing their transportation.

Regulations governing the transportation of these commodities by rail and by motor carrier are prescribed by the Interstate Commerce Commission. Let us examine some of these regulations which may help you in the day to day performance of your duties with Continental Oil Company.

Please keep in mind our remarks will be confined to transportation by rail and by motor carrier. Regulations pertaining to transportation by air and by water differ somewhat.

As early as 1866, Congress recognized the need to safeguard the public against the hazards of transporting explosives. An act of that year prescribed the conditions under which certain explosives were to be shipped in vehicles and

CWH 000001973

Page 2

vessels. Shipment of explosives in passenger vehicles and passenger vessels was prohibited. The act proved to be entirely inadequate. A number of serious disasters occurred.

The American Railway Association (now the Association of American Railroads) attempted to cope with the situation by establishing a bureau for the safe transportation of explosives and other dangerous articles in 1906. Not all railroads became members of this bureau, and little progress was made toward uniform regulations. As a result, Congress in 1908 enacted the Transportation of Explosives Act. This act authorized the Interstate Commerce Commission to formulate regulations to govern the transportation of explosives only. This act was repealed the following year; and on March 4, 1909, a broader act was passed which included not only explosives but also other dangerous articles but did not give the Commission any specific authority as to shipping regulations for other dangerous articles. Since 1911, the Commission has made regulations for the transportation of other dangerous articles based on section 15 of the Interstate Commerce Act. Finally in 1921 new legislation was enacted which gave the Commission authority over the transportation of explosives and other dangerous articles, both as to land and water, with the provisions applying not only to carriers but also to shippers.

CWH 000001974

As a result, the number and severity of accidents have been greatly reduced.

The Association of American Railroads has cooperated with the Commission since the passage of the 1908 act; and by the 1921 act, the Bureau of Explosives was authorized to make inspections and to conduct investigations; to confer with manufacturers and shippers with a view to determining what regulations will, within reasonable limits, promote safety in the movement of dangerous articles; and to bring its conclusions to the Commission in a statement of facts bearing on the matters investigated. The Commission avails itself of the information and, while not bound thereby, gives due weight to the expert nature thereof in the formulation of appropriate regulations.

The purposes of the regulations are (1) to promote the uniform enforcement of law and (2) to minimize the dangers to life and property incident to the transportation of explosives and other dangerous articles. These regulations define these articles and state the precautions which must be observed by the shipper in preparing them for shipment and by the carrier in handling them while in transit. The regulations provide that these articles may be offered for transportation only when they are in proper condition for transportation and are packed, marked, labeled, described, certified, and otherwise

Page 4

provided for in the regulations. Shipments that do not fully comply with these regulations must not be offered for transportation. It is the duty of each shipper and carrier to make the prescribed regulations effective and to thoroughly instruct employees in relation thereto.

These regulations are published as parts 71 through 79 of title 49 of the Code of Federal Regulations. They are also printed in the form of a tariff and are currently published as T. C. George's Tariff No. 19, or the Bureau of Explosives Tariff. The regulations are also reproduced in tariff form by the American Trucking Association.

What are these regulations? First of all, they define dangerous articles. Second, they describe ways in which shippers must pack and mark these articles and offer them for shipment. Third, they describe the way in which carriers will handle these shipments. Fourth, they enumerate a long list of specifications for containers which must be used for packaging dangerous articles. An outline of these regulations appears on page 5.

What are explosives and other dangerous articles? We see from the outline that they include explosives, flammable liquids, flammable solids, acids and other corrosive liquids, compressed gases, and poisonous articles.

CWH 000001976

AGENT T. C. GEORGE'S

TARIFF NO. 19

- 71. General Information and Regulations
- 72. List of Dangerous Articles
- 73. Regulations applying to shippers
 - A. Preparation of Articles
 - B. Explosives; Definition and Preparation
 - C. Flammable Liquids; Definition and Preparation
 - D. Flammable Solids; Definition and Preparation
 - E. Acids and Other Corrosive Liquids; Definition and Preparation
 - F. Compressed Gasses; Definition and Preparation
 - G. Poisonous Articles; Definition and Preparation
 - H. Marking and Labeling Explosives and Other Dangerous Articles
 - I. Shipping Instructions
- 74. Regulations applying particularly to carriers by rail freight
 - A. Loading, Unloading, Placarding, and Handling Cars
 - B. Loading and Storage Chart
 - C. Placards
 - D. Unloading from Cars
 - E. Handling by Rail
- 75. Regulations applying to carriers by rail express
- 76. Regulations applying to rail carriers in baggage service
- 77. Regulations applying to shipments by motor carriers
 - A. General Information and Regulations
 - B. Loading and Unloading
 - C. Loading and Storage Chart
 - D. Vehicles and Shipments in Transit; Accidents
 - E. Vehicles Carrying Passengers for Hire
- 78. Shipping Container Specifications
 - A. Carboys, Jugs in Tubs, Rubber Drums
 - B. Inside Containers and Linings
 - C. Cylinders
 - D. Metal Barrels, Drums, Kegs, Cases, Trunks, Boxes
 - E. Wooden Boxes, Kegs, Kits, and Drums
 - F. Fiberboard Boxes, Drums, Mailing Tubes
 - G. Bags, Cloth, Burlap, or Paper
 - H. Portable Tanks
 - J. Containers for Motor Vehicle Transportation
- 79. Specifications for Tank Cars

CWH 000001977

Let us now discuss each of these categories in turn. Although we are concerned with transportation of explosives to a minor degree, we shall omit this category and turn to a group of dangerous articles which Continental Oil Company ships in large quantities every day. These are flammable liquids.

A flammable liquid is any liquid which gives off flammable vapors (as determined by flash point from Tagliabue's open cup tester) at or below a temperature of 80°F (73.115).

Small quantities of almost all dangerous articles are exempt from regulation. However, it should never be assumed that any shipment is exempt. Instead, you should determine from the Bureau of Explosives Tariff whether the shipment is exempt.

As an example, most flammable liquids in inside containers having a capacity of 1 pint or 16 ounces each by weight and packed in strong outside containers are exempt from specification packaging, marking, and labeling requirements by rail or motor carriers. There are several exceptions to this including ethyl chloride and ethylene oxide (73.118).

One common danger in the transportation of flammable liquids is overfilled containers. The regulations provide that containers must not be completely filled. Sufficient

interior space must be left vacant to prevent leakage or distortion of containers due to the expansion of the contents from increase of temperature during transit.

Flammable liquids may not be loaded into the domes of tank cars except under certain conditions. The outage for tank cars must not be less than two percent. If the dome of the tank car does not provide sufficient outage, then vacant space must be left in the shell to make up the required outage. The actual amount of outage required is provided in section 73.116 of the Bureau of Explosives Tariff.

Regulations are provided for many specific flammable liquids such as ethylene oxide (73.124), rubber cement (73.132), and paints (73.128). Flammable liquids not specifically provided for are divided into a number of categories such as those that flash between 20°F and 80°F when the vapor pressure does not exceed 16 pounds psi absolute at 100°F, those which flash at 20°F or below, and those having a vapor pressure exceeding 16 pounds but not exceeding 27 pounds.

There are listed a number of containers which may be used for packaging these flammable liquids for transportation. These containers are indicated by specification number. Detailed specifications for each of these containers are found in parts 78 and 79 of the regulations.

CWH 000001979

Flammable liquids may be packaged in metal barrels or drums which meet specification 5, 5A, 5B, 5C, 5G, or 5M. In addition, metal barrels or drums meeting specification 17E or 17C may be used; but these are single trip containers. They may not be used again as shipping containers for dangerous articles. For flammable liquids flashing at 20°F or below, 17E drums may not exceed 5-gallon capacity, but 55-gallon 17E drums may be used for flammable liquids which flash below 80°F and above 20°F.

Flammable liquids may also be packaged in wooden barrels or kegs meeting specification 10A. They may be packaged in fiberboard boxes 12B with inside glass containers or metal cans of limited capacity. They may be packaged in wooden boxes 15A, 15B, 15C, 16A, or 19A with similar inside containers. They may also be transported in certain tank cars or in cargo tanks MC300, MC301, MC302, or MC303.

While flammable solids can readily be defined by the flash point and a laboratory test can determine if a liquid falls within these regulations, this is not true of many other categories of dangerous articles.

A flammable solid, for example, is a solid substance other than one classified as an explosive which is liable, under conditions incident to transportation, to cause fires through friction, absorption of moisture, spontaneous chemical changes,

CWH 000001980

or as a result of retained heat from the manufacturing or processing. Some examples of flammable solids are metallic sodium, phosphorous, metallic potassium, oily rags, wet waste paper, motion picture film, strike anywhere matches, magnesium scrap, and charcoal.

An oxidizing material is a substance such as chlorate, permanganate, peroxide, or a nitrate that yields oxygen readily to stimulate the combustion of organic matter.

Flammable solids or oxidizing materials must not be packed in the same outside container with corrosive liquids unless the corrosive liquids are in bottles cushioned by incombustible absorbent material in tightly closed metal containers.

All containers must be tightly and securely closed.

All liquefied petroleum gas will be odorized so as to indicate positively, by a distinctive odor, the presence of gas down to a concentration in air of not over one fifth the lower limit of combustibility. The lower limit of combustibility of propane is 2.15 percent and of butane is 1.55 percent by volume in air. Odorization is not required if harmful in the use or further processing of the liquefied petroleum gas, or if odorization will serve no useful purpose as a warning agent in such use or further processing.

Cylinders containing compressed gas must not be shipped unless they were charged by or with the consent of the owner of the cylinders.

The service pressure for which a cylinder is designed is marked on the cylinder. For example, for cylinders marked ICC 3A 1800, the service pressure is 1,800 pounds per square inch gauge.

In most cases, the amount of liquefied gas charged into cylinders must be determined by weight. The weight must be checked after disconnection from the charging line.

The liquid portion, if any, of the gas must not completely fill the cylinder at 130°F. The pressure in the cylinder at 70°F must not exceed the service pressure for which the container is designed.

The amount of gas permitted in cylinders, cargo tanks, or tank cars is usually prescribed as the maximum permitted filling density. The filling density is the percent ratio of the weight of the gas in a container to the weight of water that the container will hold. For example, the maximum permitted filling density for vinyl chloride inhibited in cylinders is 84 percent and for anhydrous ammonia is 54 percent.

Corrosive liquids are acids, alkaline caustic liquids, and other corrosive liquids which, when in contact with living tissue, will cause severe damage of such tissue by chemical

action; which, in case of leakage, will materially damage or destroy other freight by chemical action; or which are liable to cause fire when in contact with organic matter or with certain chemicals.

Containers must not be entirely filled with corrosive liquids. Sufficient interior space must be left vacant to prevent leakage or distortion of containers due to the expansion of the contents from increase of temperature during transit.

The proper outage in a tank car or other shipping container depends on the coefficient of expansion of the liquid and the maximum increase of temperature to which it will be subjected in transit. Outage must be calculated to the total capacity of the container.

Acids and other corrosive liquids must not be loaded into domes of tank cars. In tank cars, outage must be calculated to percentage of the total capacity of the shell and dome of the car. If the dome of the tank car does not provide sufficient outage, then vacant space must be left in the shell to make up the required outage. The outage for tank cars must not be less than 1 percent.

No cargo tank or portable tank or compartment thereof used for the transportation of any corrosive liquid shall be completely filled; sufficient space, not to exceed 2 percent, shall be left vacant in every case.

Packing and marking regulations are provided for many specific acids and other corrosive liquids. Separate regulations are then prescribed for those not specifically provided for.

A compressed gas is any material or mixture having in the container either an absolute pressure exceeding 40 pounds per square inch at 70°F or an absolute pressure exceeding 104 pounds per square inch at 130°F or both, or any liquid flammable material having a Reid vapor pressure exceeding 40 pounds per square inch absolute at 100°F.

Any compressed gas is classified as a flammable compressed gas if either a mixture of 13 percent or less (by volume) with air forms a flammable mixture or the flammability range with air is greater than 12 percent regardless of the lower limit.

Poisonous articles are divided into four classes according to the degree of hazard in transportation:

- (1) Extremely dangerous poison - class A
- (2) Less dangerous poison - class B
- (3) Tear gases or irritating substances - class C
- (4) Radioactive materials - class D

Class A poisons are gases or liquids of such nature that a very small amount of the gas or vapor of the liquid mixed with air is dangerous to life. Phosgene, mustard gas, and hydrocyanic acid are examples of class A poisons. As a general rule, class A poisons cannot be transported by railway express or by tank truck.

CWH 000001984

Class B poisons are liquid or solid substances, other than class A, C, or D poisons, which are known to be so toxic to man as to afford a hazard to health during transportation or which, in the absence of adequate data on human toxicity, are presumed to be toxic to man because they fall within any one of three categories when tested on laboratory animals:

- (1) Oral toxicity
- (2) Toxicity on inhalation
- (3) Toxicity by skin absorption

Class D poisons are radioactive materials, which are materials that spontaneously emit ionizing radiation.

Detailed packaging is prescribed for each of these categories of dangerous articles just as they are for flammable liquids. Some, I might add, cannot be transported in tank cars or tank trucks.

So much for the definitions of dangerous articles. Let us now turn to the manner in which packages containing dangerous articles must be marked.

Each package containing any dangerous article must be conspicuously labeled by the shipper as follows:

- (1) Red label (73.405) flammable liquids
- (2) Yellow label (73.406) flammable solids and oxidizing materials
- (3) White label (73.407) acids, alkaline caustic liquids, or corrosive liquids
- (4) Red label (73.408) flammable compressed gasses

- (5) Green label (73.408) nonflammable compressed gasses
- (6) Poison gas label (73.409) class A poisons
- (7) Poison (73.409) class B poison, liquid or solid
- (8) Radioactive materials (73.414) class D poisons, groups I and II
- (9) Radioactive materials (73.414) class D poisons, group III
- (10) Tear gas (73.409) class C poisons

The shipper's name must be shown on the labels of all packages offered for transportation by railway express or rail baggage.

Shippers must furnish and attach the labels prescribed for their packages. Labels should be applied to that part of the package bearing consignee's name and address. Labels must not be applied to packages containing articles which are not subject to the Bureau of Explosives regulations. Shippers must not use labels which, by their size, shape, and color may readily be confused with standard caution labels prescribed by the regulations. Labels must conform to standards as to size, printing, and color; and samples will be furnished, on request, by the Bureau of Explosives.

Only one type of label should be applied to any one package. Use a red label only when red and other labels are prescribed. Use a white label only when yellow or poison labels are prescribed. Use a yellow label only when yellow and poison labels are prescribed.

The shipper, when offering for transportation any dangerous article, must describe such article in the bill of lading or other shipping paper by the shipping name used in section 72.5 of the regulations.

You may have been instructed to describe articles in the same manner as they are described in the rate tariffs or classification. This description may be different from that provided in the Bureau of Explosives Tariff. In this case, both descriptions may be shown. The Bureau of Explosives description should be shown first and the further description, not inconsistent with the former description, may be shown in parenthesis. Abbreviations must not be used. Liquefied petroleum gas may not be abbreviated LPG. Aluminum triethyl may not be described as ATE.

The shipping order, bill of lading, or other shipping paper must indicate the color or kind of label applied and, for cars loaded by the shipper, the kind of placard applied to the car. We shall discuss placards later.

The shipper of any dangerous article must show in the lower left-hand corner of the shipping order, bill of lading, or other shipping paper the following certificate over the written or stamped facsimile signature of the shipper or his duly authorized agent:

"This is to certify that the above named articles are properly described, and are packed and marked and are in proper condition for transportation according to the regulations prescribed by the Interstate Commerce Commission."

When the initial movement is a switching operation, the switching order, switching receipt, or switching ticket and copies thereof, prepared by the shipper, must bear the placard endorsement.

Tank cars containing flammable liquids having a flash point of 80°F or below, except liquid road asphalt or tar, must not be offered for shipment unless originally consigned or subsequently reconsigned to parties having private siding or railroad siding facilities equipped for piping the liquid from the tank cars to permanent storage tanks of sufficient capacity to receive contents of car.

Flammable liquids must not be loaded into tank cars on carrier's property from tank trucks or drums.

In most cases, cars containing dangerous articles must be placarded; that is, placards must be securely applied one to each end and each side of the car. "Explosives" placards must be applied to cars containing class A explosives. "Dangerous" placards must be applied to:

(1) Cars containing one or more packages bearing red, yellow, white acid, or corrosive liquid caution labels or white "poison" labels.

CWH 000001988

(2) Cars containing flammable solids, oxidizing materials, or poisonous solids, class B, in bulk.

(3) Tank cars containing flammable liquids, flammable solids or oxidizing materials, acids or corrosive liquids, poisonous liquids or solids, class B compressed flammable gases, compressed nonflammable gasses.

(4) Cars containing shipments of class B explosives.

"Dangerous - class D poison" placards must be applied to cars containing shipments of class D poisons, and "Poison gas" placards must be applied to cars containing poison gas.

In some cases, placards are not required. For example, cars other than tank cars containing nonflammable compressed gas need not be placarded. Neither do cars loaded with electric storage batteries.

Placards must show in the space provided the proper name of the commodity as it is listed in the Bureau of Explosives Tariff, or the commodity name may be shown on tag board cards measuring 5 by 8 inches securely attached to each side of the car. All placards, like labels, must conform to standards prescribed by the ICC. And, like labels, placards which, by their shape, coloring, or printing, may be readily confused with the standard placards must not be used.

Shippers must have applied placards to cars loaded by them when cars are acceptable for transportation.

Earlier we mentioned that a major portion of the regulations consist of specifications for containers. Specifications are provided for a number of different containers in nine different classes:

- (1) Carboys
- (2) Inside containers and linings
- (3) Cylinders
- (4) Metal barrels, drums, kegs, cases, trunks, boxes
- (5) Wooden barrels, kegs, boxes, kits, drums
- (6) Fiberboard boxes, drums, and mailing tubes
- (7) Bags, cloth, burlap, or paper
- (8) Portable tanks
- (9) Tank cars
- (10) Containers for motor vehicle transportation

Each of these containers is identified by a number. For example, specifications 5, 5A, 5B, 5C, 5D, 6A, 17C, 17E, and 17X all cover steel drums.

Section 78.116 of the regulations pertains to the 17E drum. It is a single trip container; that is, it cannot be reused as a shipping container for dangerous articles. The actual capacity of these drums must not be less than the rated capacity plus 2 percent or greater than the rated capacity plus 1 quart, except that for containers over 30 gallons, marked capacity will be not less than rated capacity plus 2 percent, or greater than rated capacity plus 2 percent plus 1 gallon. The drums must be made from low carbon open hearth or electric steel. They may be of any capacity up to and including 55 gallons. They may be made of 24 gauge steel if they do not exceed 5 gallons capacity. Fifty-five gallon drums made to the 17E specification have 20 gauge bodies and 18 gauge heads

CWH 000001990

Each container must be marked by embossing on the head with raised marks the following:

(1) ICC-17E. This mark will be understood to certify that the container complies with all specification requirements.

(2) The letters STC, located just below or above the ICC mark to indicate "single trip container."

(3) Name or symbol (letters) of maker. This must be recorded with the Bureau of Explosives.

(4) Gauge of metal in thinnest part, rated capacity in gallons, and year of manufacture. For example, 24-5-67. When the gauge of metal in the body differs from that in the head, both must be indicated with a slanting line between and with gauge of body indicated first. For example, 20/18-55-67.

These markings must be not less than 1/2-inch high for containers having a capacity of 33 gallons or less, and others must have markings not less than 3/4-inch high.

Most containers must pass certain tests, and the 17E drum is no exception. Samples taken at random every four months must pass a hydrostatic test of 15 pounds per square inch for 5 minutes without leaking, after being dropped, filled with water to 98 percent capacity from a height of 4 feet onto solid concrete so as to strike diagonally on chime.

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A shipper is responsible for determining that dangerous articles offered for shipment by him are properly packaged and that the containers used are authorized by the regulations. The ICC markings may be accepted by the shipper as evidence that the container meets those specifications. This applies to tank cars and tank trucks as well as other containers. Even though tank trucks are furnished by the carrier, it is the responsibility of the shipper to determine that the cargo tank furnished for loading is a proper one for the commodity to be loaded.

Besides your responsibilities as a shipper in preparing and marking dangerous articles for transportation, what are some other responsibilities?

You as a shipper must permit inspections by carriers or the bureau. Methods of manufacture and packing and storage, insofar as they affect safety in transportation, must be open to inspection by a duly authorized representative of the initial carrier or of the Bureau of Explosives.

Consignees must report promptly to the Bureau of Explosives all instances of improper staving and broken, leaking, or defective containers of explosives and other dangerous articles in shipments received by them. The bureau should then promptly report to the shipper the full particulars covering all such cases.

You should always have available a copy of the current Bureau of Explosives Tariff if you ship dangerous articles.

In summary, you as a shipper should be familiar with the definitions of dangerous articles. You should know if any of the products you ship fall within these definitions. You should be able to determine from the Bureau of Explosives Tariff how to properly package and label dangerous articles and how to prepare shipping papers. If any question should arise concerning any of these regulations and you cannot readily determine the answer, please refer the question to Transportation. It is our function to keep you advised of these regulations, and we are always happy to assist you in any way possible.

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