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New ER Telephone Number Requirements

The Pipeline and Hazardous Materials Safety Administration (PHMSA) recently published a Final Rule ([74 FR 53413](#)) related to requirements for Emergency Response telephone numbers under Docket HM-206F. It can be accessed by clicking the Federal Register link or by visiting the Rulemaking section of PHMSA's website, <http://hazmat.dot.gov>.

The goal of the rule is to make it easier for first responders and others involved in hazardous materials incident responses, to more quickly and efficiently obtain emergency response information. The rule was prompted by the fact that more and more offerers are using third party emergency response information (ERI) providers such as CHEMTREC to fulfill the requirement for an emergency response telephone number of shipping papers. This, coupled with the fact that for many consolidated shipments, carriers or freight forwarders commonly consolidate information contained on original shipping papers into a single comprehensive document which accompanies the shipment, makes it difficult to know which shipper uses which ERI provider. When these events occur, it sometimes becomes difficult for a first responder to match up each hazardous material with its emergency response telephone number. To add further confusion to the issue, incident data shows that even when an emergency response telephone number is quickly located, the third party ERI provider is not able to identify the "person" who has contracted with them for their services because it is not clearly identified on the shipping paper.

The Final Rule also requires that for international shipments, the international telephone number is required to have both the country and city code (*for a US number, this would be the country code 001 plus the area code*).

Let's take a very simple example to illustrate the problem PHMSA is trying to address with this Final Rule...

Company A signs a contract with CHEMTREC to provide emergency response information on their behalf. *Company B* uses another ERI provider. A consolidated shipment of hazardous materials from *Companies A and B* (plus perhaps several other companies) is found to be

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New ER Telephone Number Requirements (cont.)

leaking in transportation. The shipping paper will identify the original shippers and the different emergency response telephone numbers. Emergency responders may not immediately know which number to call, and when they do call an ERI provider, it may be difficult to determine which original offerer has a valid contract!

To solve this problem, PHMSA will soon require the offerers to include the name of the person registered with the ERI provider or the contract number for the ERI provider either immediately before, immediately after, or above/below the emergency contact telephone number.

To meet this new requirement, which becomes mandatory on October 1, 2010, shipping papers must display the ER telephone number in a format similar to this:

EMERGENCY CONTACT:
CHEMTREC 001-703-527-3887 (Unz & Co. Contract # 123456)

Subsequent offerers, carriers, forwarders, and consolidators will be responsible for preserving this information and ensuring that it is entered on any subsequently generated shipping papers.

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