



REGULATORY ALERT

November 13, 2020

NEW 2020 EDITION OF DOT ERG REQUIRES UPDATE OF IN-CAB EMERGENCY RESPONSE INFORMATION

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New Edition of DOT Emergency Response Guidebook

Every four years, the U.S. DOT's Pipeline and Hazardous Material Safety Administration (PHMSA) publishes an updated version of its Emergency Response Guidebook (ERG) required for use by CDL drivers hauling hazardous materials. The latest version of the emergency response guide, ERG 2020 is now available. ERG 2020 updates and replaces the ERG 2016 edition currently in use by energy marketers. The ERG guidebook is intended for use by first responders during the initial phase of a transportation incident involving hazardous materials.

The new ERG 2020 is important to energy marketers because it makes changes to the emergency response guide for flammable and combustibles (Guide No. 128) required for shipments of petroleum products. The flammable and combustible classification includes gasoline (up to E10), diesel fuel, fuel oil, jet fuel, marine fuel and other distillates fuels. Information contained in Guide No. 128 must be kept in the cab of every commercial motor vehicle (CMV) hauling these products. Drivers must present the relevant ERG information to first responders, along with product transfer documents accompanying the shipment in the event of an emergency involving the hazardous lading.

New ERG Language for Guide No. 128

Under federal regulations (49 CFR 172.602), a printed copy of the **most recent version** of the ERG booklet or a printed copy of information contained in Guide No. 128 for flammables and combustibles must be kept onboard at all times. Since the ERG 2020 edition adds new language to Guide No. 128, petroleum marketers must update onboard emergency response documents accordingly.

How to Comply

In addition to required information on shipping papers identifying the hazardous material being transported (ex. *UN 1203 Gasoline 3, PG II*) drivers must also keep **separate** information on the lading that includes a description of the following:

- Immediate hazards to health.
- Risks of fire or explosion.

- Immediate precautions to be taken in the event of an accident or incident.
- Immediate methods for handling fires.
- Initial methods for handling spills or leaks in the absence of fire; and
- Preliminary first aid measures.

There are three ways to comply with the PHMSA Emergency Response information requirement by keeping one of the following in the cab of the cargo tank or transport vehicle:

- The required descriptions in the six categories above printed on shipping papers.
- A copy of the required information in ERG Guide No. 128 for flammables and combustibles in a document separate from shipping papers, or
- A copy of the most recent version of ERG – ERG 2020.

Electronic Version of ERG 2020

ERG 2020 is also immediately available as a [free mobile app](#) for both Android and IOS devices and can be downloaded at Google Play and the App Store. However, the electronic version of ERG 2020 is for ***informational purposes only*** and ***cannot be used for compliance***. Only ***printed*** versions of ERG 2020 may be used for compliance.

Important! The required ERG information must be removed from the CMV by the driver in the event of an emergency and provided to first responders along with accompanying product transfer documents/shipping papers. These documents are typically kept in the side pocket of the driver side door for easy access.

Important! While publication of ERG 2020 has been officially announced, vendors may have print versions on back order due to production and delivery limitations imposed by the COVID-19 emergency.

Got Questions? Contact Mark S. Morgan, EMA Regulatory Counsel at markmorgan@verizon.net