President Message – May 2009

“Clarification of FMCSA Insurance Requirements for the transportation of internal combustion engines.”

Recently the US Department of Transportation through the Federal Motor Carrier Safety Administration (FMCSA) issued an important notice to interstate movers regarding the transportation of internal combustion engines, self-propelled vehicles, mechanical equipment containing internal combustion engines and battery powered vehicles or equipment (automobiles, motorcycles, riding lawn mowers, garden tractors, golf carts, etc.) containing any amount of flammable liquid are required to be classified as a hazardous material carrier that must maintain a minimum $1,000,000 amount of public liability insurance.

It is very important to note this change only affects movers who haul interstate under there own authority. If your interstate shipments are handled through a national van line, it is there responsibility to properly notify the FMCSA of compliance.

What do you need to do to become compliant?

1) Confirm your automobile liability insurance meets the $1,000,000 limit requirement. If not notify your insurance broker to increase your limit.

2) Revise your MCS-150 Form on file with the FMCSA to indicate a revised cargo classification. To do this, log on the to FMCSA’s website; select “Registration & Assistance: U.S. DOT Number/Operating Authority.” Then, select “Online Registration” and use your DOT number and Personal Identification Number (PIN) to access and update your existing MCS-150 Form. Update your form to show your hazardous material carrier status if you transport internal combustion engines by indicating in Block 25 that you are a Carrier transporting CLASS 9 materials in Non-Bulk (NB) amounts. (This form is similar to the form that you will be making changes to http://safer.fmcsa.dot.gov/public/MCS150B.asp)

An important point to note is that under the regulations (49 CFR §173.220), shipments by motor carriers containing internal combustion engines, self-propelled vehicles, mechanical equipment containing internal combustion engines and battery powered vehicles or equipment, are not subject to the rules that would otherwise require marking, labeling and vehicle placard. In addition, your employees are not required to be trained as hazmat employees. We would still caution however, that you continue to follow your own internal procedures (such as draining gas tanks) and that your employees continue to take proper precautions to ensure that any container (like lawn mower gas tanks which have been drained), containing flammable liquids or residual fumes be securely closed.

In closing, if your current limit already meets the new minimum requirement then the ICC Filing made on your behalf by the Mover’s Choice Program is already on file with the FMCSA. Therefore, the only requirement needed is for your office to up-date the MCS-150 Form. If you have any questions or need additional information, the FMCSA asks that you contact their Customer Support Hotline at (866) 637-0635.

Mover’s Choice wants to continue to thank you for allowing us to provide your insurance coverage and we are also available to answer any questions regarding this change.