

Forget what you know about Consumer Commodity ORM-D, Its days are number

The ORM-D classification expires December 31, 2013. ORM-D-AIR expires December 31, 2012. Limited quantity and a new classification Consumer Commodity ID 8000 will replace ORM-D and ORM-D-AIR. Some products currently being shipped as ORM-D are not eligible for limited quantity or Consumer Commodity ID 8000 and will have to be shipped as fully regulated. Many packages now being shipped as Consumer Commodity ORM-D are too large to be shipped as limited quantity or ID 8000. Shippers must insure all products being shipped comply with the new regulations (HM-215K) published January 19, 2010.

HM-215K Changes include:

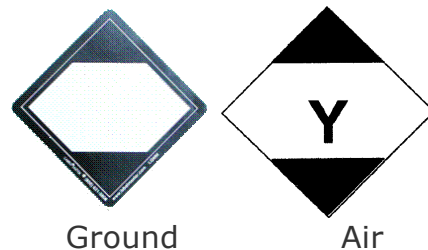
- Elimination of Consumer Commodity ORM-D
- Limited Quantity revisions including smaller quantity limits for air shipments
- Overpack markings
- Hazardous Materials Table (HMT) additions, revisions, and deletions
- In Vitro Testing for Corrosives (A alternative to animal testing)
- IBC Rebottling
- Division 1.4S Explosives Classification
- Metal Hydride Storage Systems in Conveyances
- Sour Crude Oil Classification

We will only cover elimination of Consumer Commodity and the limited quantity and related revisions. If you need help with these changes or need a copy of the rulemaking, please contact us.

Limited Quantity and Consumer Commodity Regulations

The Consumer Commodity exceptions will be eliminated as they currently exist. Revised limited quantity will replace ORM-D for truck, rail and vessel shipments.

A new Consumer Commodity ID 8000 classification will replace the ORM-D-air exception. ID 8000 **will only apply on class 2** (non-toxic aerosols), **class 3** packing groups II & III only, **division 6.1** packing group III only, **UN 3077, UN 3082** (environmentally hazardous materials) and **UN 3175** (solids containing flammable liquids). All other classes/divisions will not be eligible for this exception. Read 173.167 requirements carefully. Limited quantity provisions now include new markings for ground and air, as shown below:



These markings are 100 x 100 mm unless the packaging is too small. 50 x 50 mm markings will be allowed on small packagings. This is much bigger than most ORM-D Markings.

Air shipments will require hazard class label(s) **and** the new limited quantity marking. Quantity and packaging changes are being modified especially for air shipments. Many packagings may be required to have a secondary means of closure or a packaging liner. Shipping papers will be required for air and water shipments of the limited quantities but will not be required for ground shipments. Shipping papers will be required for domestic vessel shipments. ORM-D vessel shipments are not currently subject to DOT HM shipping paper requirements. Flammable limited quantity shipments via vessel will now be required to indicate flashpoints on documentation. All packages classified and marked as ORM-D can be shipped as ORM-D until December 31, 2013. After January 1, 2014, ORM-Ds will need to be reclassified as limited quantities or fully regulated.



Hazmat Help

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Forget what you know about Consumer Commodity ORM-D, Its days are number (continued)

All packages classified and marked as ORM-D-AIR can be shipped as ORM-D-AIR until December 31, 2012. After January 1, 2013 some ORM-D-AIR products may be reclassified as Consumer Commodity ID 8000 as previously discussed.

Please note not all products now eligible for ORM-D-AIR can be ID 8000.

Inner package and shipping package limits for air shipments

§173.27 Table 3 Maximum net quantity per inner packaging authorized as limited quantity by air. *This table is not labeled properly. It also specifies the maximum net quantity authorized in each OUTER packaging.*

This reduces the size of inner containers and size of packagings of limited quantity allowed to be shipped by air. This will force some products to be shipped by air as fully regulated. Examples: Acetone UN 1090, a PG II flammable was authorized as limited quantity or consumer commodity in 1 liter inner containers and 66 lbs per package. 173.27 Table 3 reduces this to 500 ml per inner container and 1 liter per outer package. Acetic acid solution, UN 2790, PGII was authorized up to 1 liter in inner containers. It is now reduced to 100 ml. Outer package limit was 30 kg as limited quantity. The new limit is 500 ml (16.9 ounces). If you ship limited quantity or consumer commodities by air you need to check to see what will be permitted under these new regulations. You may not be able to ship the amounts you now ship.

Please note quantity limits may be different in the new consumer commodity regulation. See new Consumer Commodity exception 49 CFR §173.167.

New Consumer Commodity ID 8000 **49 CFR§173.167**

This is very different from Consumer Commodity ORM-D-AIR. It is closer to Consumer Commodity ID 8000 in the IATA Dangerous Goods Regulations.

Not all hazard classes can be reclassified to ID 8000. ID 8000 **will only apply on class 2** (non-toxic aerosols), **class 3** packing groups II & III only, **division 6.1** packing group III only, Class **9** only **UN 3077 & UN 3082** (environmentally hazardous materials) and UN 3175 (solids containing flammable liquids). All other classes/divisions will not be eligible for this exception. Even some hair colorings containing **division 5.1** materials are not eligible for reclassification to ID 8000. All consumer commodity and limited quantity classifications shipped by air must be checked. Most inner package size limits are also reduced in this item. Inner packagings are limited to 500 mL for liquids and 500 g for most materials. This is a big step down from 5 liters that was authorized for some ORM-Ds. Going from 1.3 gallons to 16.9 ounces per container may create some problems.

Special Provision 149 §172.102

Special Provision 149 §172.102 will not apply to air shipments anymore. This reduces the quantity per inner package allowed for 14 very common proper shipping names from 5 liters to 1 liter. Examples are perfume, paint, adhesives, printing ink and polyester resin. By air, these products will become fully regulated. This may increase your packaging and shipping costs.

Overpack Markings §173.25

This change will require consumer commodity and limited quantity overpacks to be marked with an overpack marking. One recent DOT interpretation states a shrink-wrapped pallet is an overpack. This means additional markings on shrink-wrapped pallets.

Hazardous Materials Table (HMT) additions, revisions, and deletions §172.101

There are 17 additions to the HMT including the addition of Consumer Commodity ID 8000. Other entries have been modified. Please check and see if any of your products are affected.