



U.S. Department  
of Transportation

1200 New Jersey Avenue SE  
Washington, DC 20590

**Pipeline and Hazardous  
Materials Safety  
Administration**

**SEP 08 2011**

Ms. Jennifer Eberle  
Manager, Transportation Compliance  
Veolia Environmental Services  
1 Eden Lane  
Flanders, NJ 07836

Reference No. 11-0127

Dear Ms. Eberle:

This is in response to your May 26, 2011 letter concerning the display of the "ORM-D" hazard class on a shipping paper for a "Consumer commodity." Specifically, you ask if it is permissible to omit the hyphen between the letters "m" and "d" under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180).

The answer is no. Although the HMR permit a proper shipping name to appear on a shipping paper without punctuation marks (see § 172.101(c), it provides no such relief for the display of a hazard class.

For your information, please note that the HMR is phasing out use of the ORM-D hazard class and it will no longer be permitted to be used in domestic transportation after December 31, 2013 (see 76 FR 3308, 1/19/2011, Docket No. PHMSA-2009-0126 (HM-215K)). Various sections of the HMR will implement new limited quantity provisions in its place that will establish a standardized system for national and international multimodal transportation. Under this new system, consumer commodities will have the same provisions and requirements for international and national transportation as the approach for deminimis quantities, and excepted quantities, and will promote compliance, efficiency and consistent training and lower costs after implementation.

I hope this satisfies your request.

Sincerely,

T. Glenn Foster  
Chief, Regulatory Review and Reinvention Branch  
Standards and Rulemaking Division



Edmonson  
§ 172.101  
§ 172.200  
Shipping Papers  
11-0127

May 26, 2011

Office of Hazardous Materials Standards  
Pipeline and Hazardous Materials Safety Administration  
Attn: PHH-10  
U.S. Department of Transportation  
East Building  
1200 New Jersey Avenue S.E.  
Washington DC 20590-0001

RE: Request for Interpretation Regarding Display of the "ORM-D" Hazard Class on a Shipping Paper

To Whom It May Concern:

Veolia is requesting guidance from PHMSA regarding indication of the "ORM-D" hazard class on a shipping paper. Is it permissible to display "ORM-D" as "ORMD" (without the hyphen between the M and the D)?

Your written response to this question is greatly appreciated. If you require any further information regarding this request please feel free to contact me at [jennifer.eberle@veoliaes.com](mailto:jennifer.eberle@veoliaes.com) or 973-448-4209.

Thank you,

Jennifer Eberle  
Manager, Transportation Compliance