



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue SE
Washington, DC 20590

MAR 30 2012

Mr. Bob Cogen
ADG Compliance Manager
United Parcel Service
9406 Grade Lane
Louisville, KY 40213

Ref. No. 12-0018

Dear Mr. Cogen:

This responds to your January 18, 2012 letter regarding limited quantity exceptions provided in the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-185). On January 19, 2011, PHMSA published a final rule (HM-215K; 76 FR 3308) to align the HMR with international standards for the transportation of hazardous materials. Specifically, you request clarification on the applicability of outer package quantity limitations for air limited quantity packages adopted in the final rule. Your questions are paraphrased and answered as follows:

Q1. Are air limited quantity packages marked in accordance with § 172.315(d) subject to the outer package net quantity limits contained in 49 CFR 173.27 Table 3?

A1. Yes.

Q2. What, if any, transitional exceptions are allowed for the air transport of limited quantity packages that exceed the outer package net quantity limits contained in 49 CFR 173.27 Table 3?

A2. There are no transitional exceptions allowed for the air transport of limited quantity packages that exceed the outer package net quantity limits contained in 49 CFR 173.27 Table 3.

I hope this answers your inquiry. If you need additional assistance, please contact this office at (202) 366-8553.

Sincerely,

Ben Supko
Acting Chief, Standards Development Branch
Standards and Rulemaking Division

Boothe
§ 172.315(d)
§ 173.27
Air
12-0018

Hazardous Material Information Center
U.S. DOT/PHMSA (PHH-10)
1200 New Jersey Avenue, SE East Building, 2nd Floor
Washington, DC 20590

January 18, 2012

Subject: Applicability of 173.27, Table 3 Limits

To Whom It May Concern:

I am writing to request written clarification of the applicability of outer package quantity limitations for Air Limited Quantity packages published in HM-215K.

1. Are air limited quantity packages marked according to 172.315(d) subject to the outer package net quantity limits contained in 49 CFR 173.27 Table 3?
2. What, if any, transitional exceptions are allowed for the air transport of limited quantity packages that exceed the outer package net quantity limits contained in 49 CFR 173.27 Table 3?

Thank you in advance for your assistance.

Sincerely,

Bob Cogen

ADG Compliance Manager/ UPS
9406 Grade Lane
Louisville, KY 40213