



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

MAR 28 2019

Joanna Kilburn
SorbTech, Inc.
1305 Veterans Parkway, Suite 600
Clarksville, IN 47129

Reference No. 18-0139

Dear Ms. Kilburn:

This letter is in response to your November 2, 2018, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to limited quantity shipments by air. Specifically, you seek clarification of the shipping paper requirements for domestic and international shipments of limited quantities by air originating in the United States.

The HMR define "limited quantity" as the maximum amount of a hazardous material for which there is a specific labeling or packaging exception. Although excepted from certain HMR requirements (i.e., specification packaging and placarding), a limited quantity package requires an accompanying shipping paper when offered for transportation or transported by air or vessel (see §§ 173.150 through 173.155). Section 172.203(b) of the HMR states that when a shipping paper is required for a material offered for transportation as a "limited quantity," it must include the words "Limited Quantity" or "Ltd Qty" following the basic description.

While your email references the International Air Transport Association (IATA), please note that the HMR do not officially recognize the IATA Dangerous Goods Regulations for purposes of transporting hazardous materials. However, § 171.22 of the HMR authorizes use of the International Civil Aviation Organization's (ICAO) Technical Instructions for the Safe Transport of Dangerous Goods by Air (Technical Instructions) provided shipments offered under the ICAO Technical Instructions conform to the applicable requirements of §§ 171.23 and 171.24. The ICAO Technical Instructions provide exceptions for limited quantities under Part 3; Chapter 4. Specifically, the dangerous goods transport document must include the applicable limited quantity packing instruction identified by the prefix letter "Y" indicated in Column 10 of the Dangerous Goods List (see Part 5; Chapter 4.1.5.8.1 of the ICAO Technical Instructions). Therefore, the "Y" packing instruction would replace the words "Limited Quantity" or "Ltd Qty" when shipping limited quantity packages internationally in accordance with the ICAO Technical Instructions.

I hope this information is helpful. Please contact us if we can be of further assistance.

Sincerely,

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

Ballengee
18-0139

January, Ikeya CTR (PHMSA)

From: INFOCNTR (PHMSA)
Sent: Friday, November 02, 2018 4:38 PM
To: Hazmat Interps
Subject: FW: Request for Interpretation

Hello Alice and Ikeya,

Below is a request for letter of interpretation. Apparently, her carrier will not take the shipment since it is marked limited quantity on the shipping paper, which is a requirement under our regulations.

Thanks,

Jonathon, HMIC

From: Joanna Kilburn [mailto:jkilburn@sorbtechinc.com]
Sent: Friday, November 02, 2018 12:39 PM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Cc: D. Payne <dpayne@sorbtechinc.com>
Subject: Request for Interpretation

I would like to request a letter of interpretation of 49 CFR §172.203(b) with regards to the requirement for "Limited Quantity" or "LTD QTY" following the basic description on an IATA Shipper's Declaration for Dangerous Goods. The two major carriers in the United States advised the "Limited Quantity" or "LTD QTY" is not required because the "Y" packing instruction indicates the material is a limited quantity. Can you please clarify what is required for domestic and international shipments originating in the United States of limited quantities via air on the shipping documents?

Regards,

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