



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, D.C. 20590

MAR 17 2008

Mr. Mark Smith  
Hazardous Materials Instructor  
Northern Air Cargo  
Anchorage, AK 99502

Ref. No. 07-0236

Dear Mr. Smith:

This responds to your December 18, 2007 email requesting clarification of the shipping paper requirements for consumer commodity (ORM-D) materials under the hazardous materials regulations (HMR; 49 CFR Parts 171-180) and the International Civil Aviation Organization (ICAO) Technical Instructions (TI). You note that under the ICAO TI, for a material described as an "ID8000, consumer commodity, 9," the gross mass may be indicated on the shipping paper using the average gross mass per package (for example, if there are 10 packages and the total gross mass of them is 100 kg, the dangerous goods transport document may show this as "average gross mass per package 10kg"). You ask if the HMR permit the use of average gross mass per package to indicate total quantity on shipping papers for domestic transportation of consumer commodity, ORM-D materials by air.

The answer is no. For transportation by aircraft, the gross mass per package is required to be indicated on the shipping paper for consumer commodity (ORM-D) materials (§ 172.202(a)(6)). The use of average gross mass per package is not authorized by the HMR.

Note that § 171.22 authorizes the use of the ICAO TI for transportation of hazardous materials by aircraft. Therefore, average gross mass per package may be used to describe the quantity of a material on a shipping paper when the material is described as "ID8000, consumer commodity, 9" in accordance with the ICAO TI. Please keep in mind that many hazardous materials that qualify as ORM-D consumer commodities under the HMR may not qualify as Class 9 consumer commodities under the ICAO TI.

I hope this information is helpful. Please contact us if you require additional assistance.

Sincerely,

John A. Gale  
Chief, Standards Development  
Office of Hazardous Materials Standards



Eichenlaub  
§171.11  
§172.101  
§173.156  
Packages  
07-0236

18 Dec 07

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, SE.  
Washington, DC 20590-0001

Re: Using average gross mass for piece and weight description of 'consumer commodity ORMD' on shipping papers for air transport.

Under the ICAO Technical Instructions, packing instruction 910(1)(2), a shipper is allowed to offer an average gross mass of packages for an ID8000, consumer commodity, 9. (For example, if there are 10 packages and the total gross mass of them is 100kg, the dangerous goods transport document may show this as "average gross mass per package 10kg".)

This option is not given under 49CFR, but its use is not restricted for domestic air transport under 49CFR 171.22, 171.23 & 171.24. Is this description allowed to be used domestically for air shipments?

If so, is it restricted to the definition of an ID8000, consumer commodity, 9 as defined in ICAO packing instruction 910, or can the definition and reclassification of a consumer commodity ORMD offered under 49CFR be used?

Sincerely,

Mark Smith  
Hazardous Materials Instructor  
Northern Air Cargo  
907-249-5186