



U.S. Department of Transportation
**Pipeline and Hazardous Materials
Safety Administration**

1200 New Jersey Ave, S.E.
Washington, D.C. 20590

APR 16 2013

Fred A Romero
Dangerous Good of America
1651 NW 68th St., Cargo Building 706
Suite 211
Miami, FL 33152-0487

Reference No. 13-0033

Dear Mr. Romero:

This is in response to your January 11, 2013 letter to the Pipeline and Hazardous Materials Safety Administration (PHMSA) requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180), applicable to the use of the letter "G" on shipping papers. In your letter, you note that § 172.202(a)(6)(vi) states that for items where "No Limit" is shown in Column (9A) (Quantity limitations for passenger aircraft/rail) or (9B) (Quantity limitations for cargo aircraft only) of the Hazardous Materials Table (HMT), the quantity shown must be the net mass or volume of the material. For articles (e.g., UN2800 and UN3166), the quantity must be the gross mass, followed by the letter "G." You also note that in the International Civil Aviation Organization Technical Instructions (ICAO TI), as well as the International Air Transport Association Dangerous Goods Regulations (IATA DGR), the letter "G" is no longer required on the shipping paper or the shippers declaration. You ask if you must include the gross mass followed by the letter "G" as required by the HMR, or may you exclude the letter "G" on the shipping paper as indicated in the ICAO TI and IATA regulations.

The provisions of §§ 171.23 and 171.24 of the HMR authorize the use of the ICAO TI for packaging, marking, labeling, classifying, and describing hazardous materials which are transported by air and by motor vehicle either before or after being transported by air. Therefore, if your shipment is being transported in accordance with the ICAO TI as authorized by the HMR, the letter "G" would not be required on the shipping paper.

I hope this satisfies your request.

Sincerely,

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

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Handwritten notes:
1/11/13
15-0235

January 11, 2013

U.S. Department of Transportation
Associate Administrator for Hazardous Materials Safety
Pipeline and Hazardous Materials Safety Administration
1200 New Jersey Ave., SE
East Building, Second Floor
Washington, DC 20590 USA

Dear Rulemakers;

According to §172.202 (6)(iii)(vi) For items where "No Limit" is shown in Column (9A) or (9B) of the § 172.101 table, the quantity shown must be the net mass or volume of the material. For articles (e.g., UN2800 and UN3166) the quantity must be the gross mass, followed by the letter "G";

In the International Civil Aviation Organization (ICAO) Technical Instructions as well as in the International Air Transportation Association (IATA), the letter "G" is no longer required on the shipping paper or shipper's declaration.

My question to you is if I must include the gross mass followed by the letter "G" or may I not include the letter "G" as indicated in the ICAO and IATA regulations without consequences?

Thank you for your prompt reply to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Fred A. Romero".

Fred A Romero - Instructor