



U.S. Department  
of Transportation

**Research and  
Special Programs  
Administration**

400 Seventh Street, S.W.  
Washington, D.C. 20590

MAR 10 2000

Ms. Cassie Mayrand-Burney  
Ford Motor Company  
QMP Building - Room 351-2  
Safety Office  
North American Group  
Dearborn, MI 48121

Ref. No. 00-0037

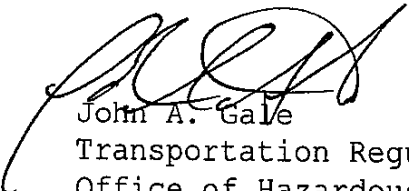
Dear Ms. Mayrand-Burney:

This is in response to your letter dated January 31, 2000, regarding the transportation of aerosols under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically you ask if aerosols may be offered for transportation in packages that exceed 30 kg (66 pounds).

Materials transported under the proper shipping name "Aerosols" must be packaged in accordance with § 173.306. Under § 173.306 each outside package may not exceed 30 kg (66 pounds) gross weight. However, a limited quantity of aerosols that meets the definition of consumer commodity may be renamed consumer commodity and reclassified ORM-D (see § 173.306(h)). The 30 kg (66 pound) gross weight limitation does not apply to materials classed as ORM-D when shipped under the provisions of § 173.156(b)(1) or (2).

I hope this satisfies your request.

Sincerely,

  
John A. Gale  
Transportation Regulations Specialist  
Office of Hazardous Materials Standards



000037

173306

*Ford Motor Company*

BALX

\$173.306

00-0037

Global Hazardous Materials  
Compliance Office  
North American Group

January 31, 2000.

To: Mr. Edward T. Mazzullo  
Director, Office of Hazardous Materials Standards  
U.S. DOT/RSPA (DHM-10)  
400 7th Street S.W.  
Washington, D.C. 20590-0001

Subject: Request for Interpretation Regarding the Shipment of Aerosol Cans

I am writing to request a written interpretation from the Office of Hazardous Materials Standards for clarification in regards to the shipment of aerosol cans above the 66 pound limit. Referencing the 49 CFR, hazardous material table (172.101), from the manner it is presented on the table, it implies Aerosol cans (each not exceeding 1 liter capacity) can be shipped fully regulated as 'Aerosol Cans, flammable (or non-flammable), 2.1, UN1950' at any quantity. Upon inquiry to the Department of Transportation, they had stated that aerosol cans, if above the 66 pound limit are prohibited to be shipped other than under the 'Exceptions' column, where it references 173.306. Here the regulation states that compressed gases cannot be shipped in 'limited quantities' if the package exceeds 66 pounds. Doesn't this mean aerosols can be shipped fully regulated and can exceed the 66 pound limit if shipped fully regulated (and not as an LTD QTY)? If this is not the case, could you please provide this office a written interpretation of this part of the regulation for clarification and for our records.

Thanks in advance for your assistance with this matter.

Sincerely,

*Cassie Mayrand-Burney*  
Cassie Mayrand-Burney

needs letter stating "aerosol" is a ltd qty  
only and is restricted to 66 lb gross  
weight ~~IN~~