



SHIPPING LIMITED QUANTITIES

On **January 19, 2011** the Pipeline and Hazardous Materials Safety Administration (PHMSA) published a final rule (**HM-215K**) that harmonized the requirements of the Hazardous materials Regulations (HMR) with international transport regulations. The information below is a baseline about the requirements for shipping limited quantities.

The most far reaching changes in the rule is the elimination of the ORM-D requirements and the introduction of the internationally harmonized limited quantity requirements.

The implications of the recently adopted changes are significant and will impact numerous companies particularly those in the retail and consumer products business.

The effective date of the rule is January 19, 2011 with a one year delayed compliance date of January 1, 2012.

However, additional time is authorized for the phasing out of the ORM-D classification in recognition of the difficulties that companies will face in transitioning to the new international requirements.

Transition Dates

The bottom line is that for **air transportation**, companies have until **December 31, 2012** to comply with the new requirements. **All other modes have until December 31, 2013 to comply.**

In paragraph 172.200(b)(3), the shipping paper exception for ORM-D shipments offered for transport by road and rail applies until December 31, 2013. The exception does not apply for air or ocean shipments.

Paragraph 172.315(d) provides a transition for limited quantity markings. For transportation by aircraft, the current limited quantity marking (i.e., the applicable provisions in effect on October 1, 2010) may be used until December 31, 2012, and for all other modes until December 31, 2013.

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Paragraphs 172.316(a)(1) and (2) provide transitions for continued use of the ORM-D-Air and ORM-D markings. For transportation by aircraft, the current markings (i.e., the applicable provisions in effect on October 1, 2010) may be used until December 31, 2012, and for all other modes until December 31, 2013.

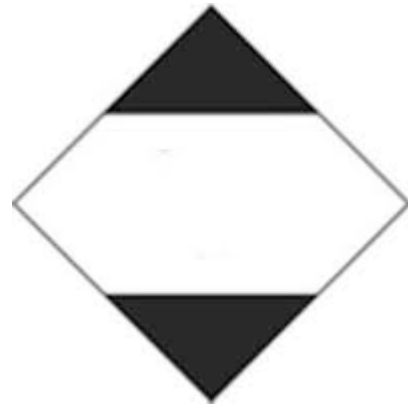
In paragraph (c) of sections 173.150-173.155, 173.167 and 173.306 Consumer commodities, the following transition periods are provided:

Until December 31, 2012, an ORM-D-AIR material may be offered for transport, in accordance with the applicable provisions in effect on October 1, 2010.

Until December 31, 2013, an ORM-D package may continue to be offered for transport by road, rail and ocean with applicable provisions in effect on October 1, 2010.

The label with the "Y" symbol must be used when shipping Limited Quantities by air.

The Blank label must be used when shipping Limited Quantities by ground, rail or sea.



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