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# AFTER ORM-D: SHIPPING HAZMAT CONSUMER COMMODITIES IN 2021

## Executive Summary

As of January 1, 2021, the ORM-D designation for hazardous materials consumer commodities is no more. This guide covers key requirements you must know to ship hazmat consumer commodities by ground, air, and vessel—in 2021 and beyond.

## What is a consumer commodity?

US DOT's Hazardous Materials Regulations (HMR) define a consumer commodity as "a material that is packaged and distributed in a form intended for, or suitable for, retail sale for consumption by individuals for personal care or household use. This term also includes drugs and medicines."

[49 CFR 171.8]

Examples of hazardous material consumer commodities include many everyday consumer products.







Hand sanitizer



Essential oils



Mouthwash



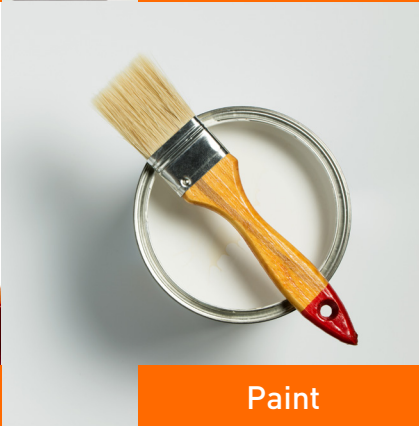
Paint thinner



Corrosive drain de-clogging liquids



Ink



Paint



Medicines



Waterproof mascara



Cleaning compounds



Hairspray and other aerosol products



Lighters and matches



Stains



Adhesives containing flammable liquids



Pesticide sprays



Isopropyl alcohol



Nail polish and nail polish remover



Perfume



Varnishes



Bleach

## As of January 1, 2021, ORM-D is O-V-E-R



Until December 31, 2020, US DOT allowed shippers to re-class some hazardous material consumer commodities as Other Regulated Materials-D (ORM-D) and re-name them “consumer commodity.” The ORM-D designation afforded exceptions from many packaging, marking, and labeling regulations, as well as the requirement for DOT shipping papers.

As of **January 1, 2021**, the ORM-D classification is no longer allowed in ground transportation.

In order to qualify for relief, hazmat consumer commodities now must be shipped according to the regulations for limited quantities.

Here’s the good news: Limited quantity shipments are typically afforded the same exceptions as ORM-D shipments when you follow some basic requirements.





# Shipping Hazmat Consumer Commodities By Ground

When shipped by ground, limited quantity hazmat packages are afforded most of the same reliefs that ORM-D packages were before 2021.

Limited quantity hazmat packages are typically excepted from:

- Hazard class labeling;
- Use of specification packaging;
- Shipping paper and emergency response information; and
- Placarding vehicles.

Remember: A limited quantity of hazmat is still hazmat. You must comply with certain requirements to ensure safe transportation by ground.

Limited quantity packages must:

- Not exceed a gross weight of 30 kg (66 lbs.);
- Meet general packaging requirements in 49 CFR 173, Subpart B; and
- Be packed in “combination” packaging (e.g., bottles or cans in a box).

DOT typically limits inner packagings to 1 to 5 kg capacity, depending on the hazard class and packing group of the material.



The **Shipping Limited Quantities & Consumer Commodities** online course covers the latest requirements for shipping small quantities of hazardous materials by ground (49 CFR), air (IATA *DGR*), and vessel (*IMDG Code*).



For ground transportation, hazmat consumer commodity shipments must be marked with the limited quantity marking shown here.



# Shipping Hazmat Consumer Commodities By Air

The International Air Transport Association's *Dangerous Goods Regulations* (IATA *DGR*) lays out additional rules for shipping consumer commodities by air.

The Proper Shipping Name (PSN) "consumer commodity" with ID number 8000 exists in the IATA *DGR* and is regulated as a miscellaneous Class 9 dangerous good.

Very few materials can be shipped by air using the consumer commodity regulations. For a list of approved materials, Special Provision A112 in Column M of the IATA *DGR* 4.2 List of Dangerous Goods sends the shipper to IATA *DGR* 4.4.

**Only** these hazard classes and packing groups may be shipped as consumer commodities by air:

- Class 2, non-toxic aerosols
- Class 3, PG II and III only
- Division 6.1, PG III only
- UN 3077, Environmentally hazardous substance, solid, n.o.s.
- UN 3082, Environmentally hazardous substance, liquid, n.o.s.
- UN 3175, Solids containing flammable liquid, n.o.s.
- UN 3334, Aviation regulated liquid, n.o.s.
- UN 3335, Aviation regulated solid, n.o.s.



The **Hazmat Air Shipper Certification** online course builds on your 49 CFR expertise to cover the latest international standards for air shipments. Learn all the additional requirements you must know to ship hazardous materials by cargo or passenger aircraft.



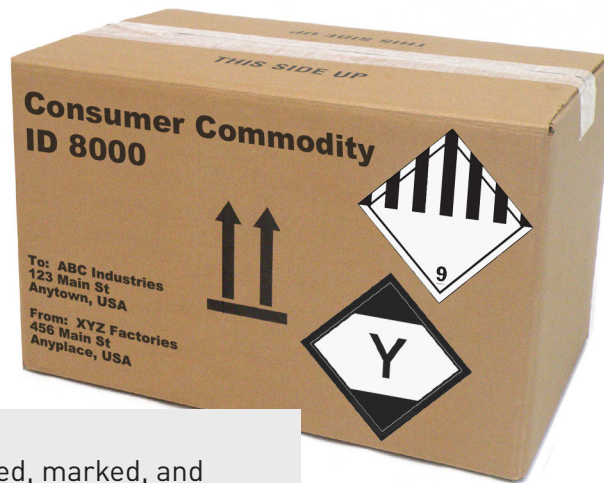
# Shipping Hazmat Consumer Commodities By Air

## Using Packing Instruction Y963

The IATA *DGR* Packing Instruction used to ship consumer commodities by air is Y963, found in IATA *DGR* Section 5.9.

PI Y963 is where you will find requirements and reliefs that apply to your material, like:

- Packaging requirements (e.g., combination packaging must be used);
- Reliefs (e.g. UN-rated packaging not required); and
- Quantity limits for inner packagings.



A consumer commodity packaged, marked, and labeled for air transportation will look something like the box shown here.

## TWO NOTES

1. Orientation arrows are required **only** for packages that contain liquids.
2. When you offer multiple packages that differ in gross weight, you must mark the gross weight of each package (e.g., "5 kg G" and "3 kg G") adjacent to the Proper Shipping Name and UN number.







# Shipping Hazmat Consumer Commodities By Vessel

For vessel transport, a shipment packaged as a consumer commodity can be shipped fully regulated or, more commonly, as a limited quantity.

The *IMDG Code* does not have a special category like the DOT's old ORM-D. Nor does it allow shippers to use the Proper Shipping Name "Consumer Commodity" under miscellaneous Class 9 like IATA does.

When shipped by vessel, materials retain their original Proper Shipping Names and hazard classes for shipping paper entries.

If the inner packaging quantities are within the limits expressed in Column (7a) of the IMDG 3.2 Dangerous Goods List and the package meets all the requirements of IMDG Chapter 3.4, then the consumer commodity can be shipped as a limited quantity. In that case, the package (containing liquids) may look like this:



Like limited quantity ground shipments, an eligible consumer commodity shipped by vessel needs only the limited quantity marking.



# Shipping Hazmat Consumer Commodities By Ground, Air, and Vessel

The table below is a quick reference guide to help you prepare consumer commodity basic description entries for shipping papers by mode of transportation.

Regulation	Basic Description Entry	Comment
49 CFR Ground (Highway and Rail)	N/A	In general, limited quantities are excepted from the shipping paper requirements of Part 172, Subpart C
IATA <i>DGR</i>	<p><u>a. Authorized</u> ID 8000, Consumer Commodity, 9 (Note: No packing group)</p> <p><u>b. Unauthorized as consumer commodity</u> UN #, PSN, hazard class (subsidiary when applicable), PG II or III</p> <p>Example: UN 1791, Hypochlorite Solution, 8, PG II</p>	<p>a. Only those materials authorized by Special Provision A112 at IATA DGR 4.4 (from column M of IATA DGR 3.2 List of Dangerous Goods)</p> <p>b. Ship as limited quantity or fully regulated</p> <p>(Note: The words “limited quantity” or “Ltd. Qty.” are not indicated after the basic description. The “Y” packing instruction fulfills this communication.)</p>
IMDG <i>Code</i>	<p>UN #, PSN, hazard class (subsidiary when applicable), PG II or III Limited Quantity or Ltd. Qty.</p> <p>Example: UN 1791, Hypochlorite Solution, 8, PG II Limited Quantity</p>	<p>Limited quantities retain their original Proper Shipping Name (PSN) and hazard class</p> <p>(Note: Excluded from the words “marine pollutant” per IMDG 2.10.2.7)</p>



## Building Confident Compliance Teams

Effective training is the key to a confident and productive workforce. To help you and your team **build a strong compliance program** and understand the regulations that affect your business, Lion Technology designs training to empower as well as educate. Since 1977, two out of three Fortune 500 companies in manufacturing, chemical, and transportation industries—as well as Federal and State government agencies—have trusted Lion for expert training delivered by full-time instructors. At Lion’s **nationwide, interactive workshops**, industry professionals get the knowledge and tools to succeed and keep their sites in compliance.

Sometimes, you simply can’t leave your site for training. With online training at Lion.com, convenient courses for compliance managers, EHS professionals, engineers, and shift workers are just a click away. Learn on your own schedule with **interactive, 24/7 online courses** or **join a live webinar** for guidance on critical regulatory topics and new rules. Bring an expert Lion instructor to your site to present training tailored to your employees’ needs. Lion can present any of our public workshops privately to your group or help you build a hazmat shipping, RCRA hazardous waste, workplace safety, or environmental training program that’s right for your team.

If you’re responsible for compliance with RCRA hazardous waste rules; 49 CFR, IATA, or IMO hazmat shipping standards; US EPA air, water, and chemical regulations; or OSHA workplace safety mandates, visit [Lion.com](https://www.lion.com) now to see how effective, engaging training can simplify your responsibilities and make it easier to comply with the complex rules that affect your job.



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