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FAQ on US Transition from ORM-D to Limited Quantity Marking

What are the new Limited Quantity requirements and what is happening to ORM-D?

On January 19, 2011 the Pipeline and Hazardous Materials Safety Administration (PHMSA) published final rule HM-215K in the Federal Register to harmonize the Hazardous Materials Regulations (HMR) in 49 CFR with the United Nations (UN) requirements for transportation of dangerous goods. One of the changes calls for the elimination of the ORM-D exception for consumer commodity shipments. Per the revised rule, items previously marked as ORM-D will have to conform to the new requirements for Limited Quantity shipments or be shipped as fully regulated items. Although the term “ORM-D” is being eliminated, most consumer commodities will continue to be eligible for the limited quantity exception. Limited Quantity, as a category, will now be exempt from more requirements and includes more hazardous materials than simply consumer commodities. The final rule also includes a new Limited Quantity marking that will replace the ORM-D on packages.

What are the effective dates and how long will pre-printed boxes that are stamped “ORM-D” allowed to be used?

Voluntary compliance with the new regulation was authorized effective January 1, 2011. The “ORM-D AIR” marking has already been phased out and is no longer allowed on air shipments. For *domestic* ground, rail and vessel shipments, the deadline for the ORM-D phase-out was December 31, 2013. However, on January 7, 2013 PHMSA extended the deadline to December 31, 2020. Therefore, beginning January 1, 2021, ORM-D will no longer be an acceptable marking for shipping hazardous materials domestically. After the mandatory compliance date, any packages of limited quantities must conform to the revised standard.

Will the new Limited Quantity requirement be different than the current ORM-D requirement?

Although some of the limited quantity limits may have changed to align with international standards, packaging, labeling and marking requirements remain the same under the new Limited Quantity requirements as they did under ORM-D with one exception: instead of marking packages with ORM-D, the new Limited Quantity marking must be used. In essence, limited quantities are now treated just like consumer commodities.

What do the new limited quantity markings look like?

- Example of the new Limited Quantity marking for ground and vessel shipments



- Example of the new Limited Quantity marking for air shipments



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Will the new limited quantity markings be accepted for international transport via IATA or IMDG?

Yes, the new markings will be accepted by both IATA and IMDG. One of the major considerations for replacing the ORM-D marking with the Limited Quantity marking was to align with international standards. Air shipments must be marked with the “Y” in the center of the diamond. IMDG will accept the air marking for multimodal shipments.

Will Canada accept the new international limited quantity mark?

Yes, according to Transport Canada they will accept the new international Limited Quantity marks.

What is LPS doing to comply with the new requirements?

All of LPS’ pre-printed aerosol boxes have been updated to replace the Consumer Commodity, ORM-D marking with the new Limited Quantity marking. In anticipation of the 2013 deadline and in order to allow our distributors enough time to deplete old inventories, LPS packaging had already been converted to the Limited Quantity marking before PHMSA issued the deadline extension.

In case I have to ship by air or want to ship fully regulated, what is the proper shipping description for affected products?

Depending on the product, the proper shipping description could be:

1. UN1950, Aerosols, 2.1
2. UN1950, Aerosols, 2.2
3. UN1950, Aerosols, 2.2 (6.1)
4. UN3159, 1,1,1,2-Tetrafluoroethane, 2.2

Please refer to the product’s (M)SDS or contact LPS for assistance, if needed.

Where can I go for more information?

A copy of the original final rule can be found in the Federal Register (Vol. 76, No. 12). 78 FR 1101 is the amendment that extends the deadline. More information can also be found on PHMSA’s website at <http://phmsa.dot.gov> or by contacting PHMSA’s Hazardous Materials Information Center via phone 1-800-HMR-4922 or e-mail at phmsa.hm-infocenter@dot.gov. If you would like to discuss issues related to LPS’ transition plan, please contact us at 800-241-8334.