



# Transportation Development group

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## U.S. Dept of Transportation Hazardous Materials Requirements for “Consumer Commodities”

Frequently Asked Questions about ORM-D and ID 8000 Consumer Commodities

### What is a “Consumer Commodity”

It is a hazardous material that is packaged in a form intended or suitable for retail sale. Generally small packagings, the shipping name includes items such as Cosmetics, Paints, Aerosols, Medicines, Nail Polish, etc.

### So, is a “Consumer Commodity” considered “hazmat” or “dangerous goods”

**Yes.** Absolutely. As a hazardous materials shipper, you are required to train your employees involved in shipping Consumer Commodity shipments by Ground every 3 years, by Air or Ocean every 2 years.

### What does “ORM-D” Mean?

ORM-D is the name of the hazard class assigned to consumer commodities under the US DOT regulations. Internationally Consumer Commodities are Class 9.

### What are the exceptions in the regulations for ORM-D materials?

1. Placarding of trucks is not required.
2. A signed shippers certification is not required for GROUND shipments
3. UN approved packaging is not required.

### Do Consumer Commodity Shipments require Hazard Labels?



Yes and no. Internationally they require a Class 9 Miscellaneous Hazard Label.

Domestically they require a rectangular ORM-D Marking or “ORM-D Air” for shipments by UPS Air or USPS.



### Is there a “Consumer Commodity” Proper Shipping Name for Ocean Shipments?

No, not exactly. Under the IMDG Ocean regulations there is neither a hazard class nor a proper shipping

name for Consumer Commodities, though there are certain exceptions from marking and labels these types of products as “Limited Quantities”.

### What type of training is required for Consumer Commodity Shippers?

Federal law requires these types of training:

- ✓ Function Oriented Training
- ✓ General Awareness Training
- ✓ Safety Training
- ✓ Security Training (new 2003 requirement)

The degree of training that an employee requires is determined by his job responsibilities.

### What’s the difference between IATA Class 9 Consumer Commodity and DOT “ORM-D” Consumer Commodity?

*ORM-D* is the Domestic Classification for ground shipments. *Class 9* is the classification by IATA for AIR shipments. Only UPS will accept ORM-D by air.

*There are significant differences in the types and quantities of materials that are allowed to be reclassified as a Consumer Commodity. IATA is MUCH more restrictive than DOT, and there is a VAST difference in the quantities allowed. I.E. IATA only allows pint containers to be inner packagings of flammable liquids where DOT allows more than 1 gallon in some cases.*

### What happens if I don’t train my people to ship ORM-D or any hazmat?

You can be fined up to \$32,500 per violation, per day. A typical fine for a medium size company is around \$30,000 for an air violation. To see actual penalty cases, you can visit us at our website [www.hazmat-news.com](http://www.hazmat-news.com) or [www.logisticstraining.com](http://www.logisticstraining.com).

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