



## Transportation Development group

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### U.S. DOT 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 certify your employees involved in ground (or air/ocean) shipping of Consumer Commodities (or LTD QTY) at least every 3 years.

##### What does “ORM-D” Mean?

ORM-D is the name of the hazard designation assigned to consumer commodities under the US DOT regulations. It stands for “Other Regulated Materials (Type D), this designation will expire 12/31/2020.

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

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

##### Do Consumer Commodities require Hazard Labels?

Yes and no. Internationally they require a Class 9



Miscellaneous Hazard Label.

Domestically they require a rectangular ORM-D marking

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”. In fact, Consumer Commodities by all modes, FIRST must qualify as a Limited Quantity.

##### Are Consumer Commodities considered HazMat or DG?

Of course, they’re considered a hazardous material for ground shipping. It is also hazardous by Ocean and Air Shipping.

##### What type of training is required for Consumer Commodity Shippers, Carriers, Truck Drivers, Forklift Operations, etc?

Federal law requires these types of training for truck drivers, shippers, exporters and all “hazmat employees”:

- ✓ Function Oriented Training
- ✓ General Awareness Training
- ✓ Safety Training
- ✓ Security Training

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

##### What kind of shipping documentation to I need?

By ground, none, though the package has to be marked. By air and ocean you need a DG Declaration and markings on the pkg.

##### 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 that will expire in 2020. *Class 9* is the classification for Consumer Commodities for AIR shipments.

*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. Ie. 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 certify my employees to ship ORM-D or I ship any hazmat incorrectly or undeclared?

You can be fined up to a maximum of \$75,000 per violation, per day. Undeclared shipments have penalties from \$10,000-\$40,000 per violation. **DOT also has an anonymous, violation tip line, at 1-800-467-4922.** Competitors have reported shippers!

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