

*The International
Trade Compliance
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January 2010

DOT Requires New Label for Excepted Quantities of Dangerous Goods



If you currently take advantage of Department of Transportation (DOT)'s small quantity exception in 49 CFR 173.4 and prepare or ship packages bearing the old small quantity label, please be aware that the requirements in this section have changed significantly and **effective January 1, 2010, this label must no longer be used.**

The Pipeline and Hazardous Materials Safety Administration (PHMSA) has taken a huge step towards the harmonization of requirements for the shipment of small quantities of dangerous goods by creating two entirely new sections in the 49 CFR and making certain changes to the small quantity exception in 49 CFR 173.4. PHMSA believes these changes will increase safety and facilitate international transportation. For complete details on the rule changes see [74 FR 2199](#) (Docket HM-215J).

- The provisions for small quantity shipments under 49 CFR 173.4 remain relatively unchanged except that it now applies only to shipments of small quantities of dangerous goods shipped domestically within the United States by ground modes such as truck or rail. The certification **label has been changed** to reflect this new modal restriction and now must read "This package conforms to 49 CFR 173.4 **for domestic highway and rail transport only.**" Unz & Company does not have plans to carry this label.
- For small quantities of dangerous goods shipped outside the US or which are transported by vessel or aircraft, PHMSA has created a **new section, 49 CFR 173.4a**. Please note that this exception may also be used for ground shipments within the US. Packages prepared under this section must meet the specific quantity limits, packaging, package testing and marking requirements included in this section. These provisions mirror those found in IATA section

Continued...

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DOT Requires New Label for Excepted Quantities of Dangerous Goods *(cont.)*

... 2.7 and IMDG chapter 3.5 which should make international and intermodal transportation of these packages much easier.

Packages prepared and offered under this new section must display the Dangerous Goods in Excepted Quantity label (the 2nd graphic shown on the first page) which is available for purchase from Unz & Co. Please note that the offerer must include the hazard class number on the label. The name of the shipper must also be added to the label unless it appears somewhere else on the package.

- **49 CFR 173.4b is another new section** which includes *de minimus exceptions* for very small quantities of dangerous goods which PHMSA believes do not pose an unreasonable risk in transportation. If you are a shipper of very small quantities of certain dangerous goods (up to 1 ml or 1 gram per inner receptacle) you may be able to take advantage of this exception which allow the shipment of materials conforming to this section as "non regulated". No marking or labeling is required on package that meet the provisions of this new section.

As with any new rule, it is important that you read the requirements carefully and adhere to all the new regulations by the published effective dates. These new sections are included in the hard copy of the Early 49 CFR as well as electronically via [PHMSA's rulemaking website](#). *These new rules became effective January 1, 2010.*