



U.S. Department  
of Transportation

**Pipeline and  
Hazardous Materials Safety  
Administration**

400 Seventh Street, S.W.  
Washington, D.C. 20590

NOV 13 2006

Mr. Dub Phillips  
Premier Trading Group  
2034 Cypress Bend Lane  
Sugar Land, TX 77478

Ref. No. 06-0232

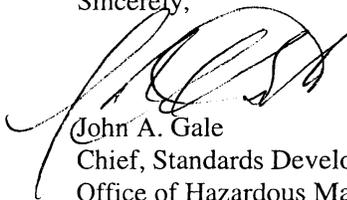
Dear Mr. Phillips:

This is response to your letter dated October 10, 2006, letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) pertaining to hazardous materials authorized to be transported under the proper shipping name "Consumer commodity". Specifically, you ask whether your charcoal briquette product may be transported as "Consumer Commodity" ORM-D.

Under § 173.151(c), charcoal briquettes may be renamed "Consumer commodity" and reclassified as "ORM-D" provided each package does not exceed 30 kg (66 lbs) gross weight and the briquettes, as packaged, meet the definitions of a consumer commodity as specified in § 171.8.

I hope this information is helpful. Please contact us if you require additional assistance.

Sincerely,



John A. Gale  
Chief, Standards Development  
Office of Hazardous Materials Standards



060232

172-101  
173.151(c)

Leary  
§ 172.701  
§ 173.151(c)  
Classification  
06-0232

**INFOCNTR <PHMSA>**

**From:** Dub Phillips [phillips@acooler.com]  
**Sent:** Tuesday, October 10, 2006 12:04 PM  
**To:** INFOCNTR <PHMSA>  
**Subject:** Charcoal Briquette  
**Attachments:** Briquette Document File.pdf

Dear Sir:

Responding to your Hazmat Representative's instructions during our phone conversation earlier today, I am requesting your reply in writing showing ORM-D classification for the Charcoal Briquette product listed below.

Please direct your reply to: Premier Trading Group, 2034 Cypress Bend Lane, Sugar Land, TX 77478 - Attention: Dub Phillips

Thank You!

This product complies with the South Coast Air Quality Management District Rule 1174. Reference No.C-108, which could pass the certification by the Air Resources Board pursuant to section 94509(h),(sections 94507-94517,Title 17, California Code of Regulations), Executive Order G-786-041-A.  
<http://www.aqmd.gov/aqmd/Interfaces/contactUs/contactUsInterface.html>

**AQMD Headquarters - (909) 396-2000**  
21865 Copley Drive - Diamond Bar, CA 91765  
**AQMD BRANCH OFFICE - (310) 233-7000**  
1500 W. Carson St. Suite 115 - Long Beach, CA. 90810

Product Information.

- A) Size = 4.75"x4.75"x1.75"(inch),
- B) 340 gram/piece - 5 Pound Bag
- C) Moisture: 3% max,
- D) Ash: 19%,
- E) Volatile matter: 18%,
- F) S: 0.3% max
- G) Fixed carbon: 60% min,
- H) Calorific value: above 6,000kcal/kg.
- I) Burning time: at least 1.5 hour (consistent heat)
- J) Each piece wrapped in plastic and enclosed inside an alaminon foil bag

Kind Regards,

10/10/2006