

Comparison of Limited Quantity and Consumer commodity Requirements of 49 CFR and International Standards
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Requirement	HMR LQ	HMR ORM-D	UN LQ	ICAO TI LQ	IMDG CODE LQ
Marking	PSN or UN diamond/ ID# (§§ 172.301 and 172.315).	“ORM-D” or “ORM- D-AIR” “Consumer commodity” (§ 172.316).	UN diamond/ID# un- less consumer commodity (ID# not required).	PSN, ID# or diamond and “LTD QTY.”	UN diamond/ID# un- less consumer commodity (ID# not required). Excep- tion includes MARPOL.
Labeling	None unless Division 6.1, Packing Groups II and III.	None	None	Required	None (Placard-size CTU LQ mark re- quired).
Documentation	Required	ORM-D-AIR only un- less RQ, waste or MARPOL.	Required unless a consumer com- modity.	Required	Required unless con- sumer commodity.
Material Authorizations	PSN entry must cite exception section in Column (8A) of HMT, typically one of the following: <ul style="list-style-type: none"> • Divisions 2.1 and 2.2 (gases and aerosols). • Class 3 (PG II, III). • Division 4.1 (Flam solids), PG II, III. • Division 4.3, PG II, III. • Division 5.1, PG II, III. • Division 5.2, Types B, C, D, E, F. • Division 6.1, PG II, III. • Class 8, PG II, III. • Class 9 Compared to UNMR the HMR: <ul style="list-style-type: none"> • Permits (23) PG I Class 3 materials as LQ.. • Permits (11) Class 9 mate- rials as LQ. 	Generally, all mate- rials authorized LQ except for Division 6.1, PG II (unless drug or medicine).	Similar to HMR ex- cept as follows: <ul style="list-style-type: none"> • Division 2.2 only (except aerosols). • Certain Class 9 materials not authorized LQ. Compared to HMR, the UNMR: <ul style="list-style-type: none"> • Permits (9) PG I Class 3 mate- rials as LQ. • Permits (10) Class 9 mate- rials as LQ. 	<ul style="list-style-type: none"> • Aerosols (Divisions 2.1, 2.1 w/sub risks) and Small re- ceptacles (Divisions 2.1, 2.2 w/o sub risks). <ul style="list-style-type: none"> • Class 3, PG II, III.. • Division 4.1, PG II, III (no self- reactives). • Division 4.3, PG II, III (solids only). • Division 5.1, PG II,III. • Division 5.2, Types C, D, E, F when part of PRK, FAK or CK. • Division 6.1, PG II, III. • Class 8, PG II, III excluding 2794, 2795, 2803, 2809 and 3028 (bat- teries, gallium, mer- cury). • Class 9 (1941, 1990, 2071, 3077, 3082, 3316 only). 	Generally, aligned with UNMR with minor vessel- unique require- ments.

Requirement	HMR LQ	HMR ORM-D	UN LQ	ICAO TI LQ	IMDG CODE LQ
LQ Quantity Limits	<ul style="list-style-type: none"> • Aerosols more restrictive than UNMR, ICAO TI and IMDG Code. • Classes and Divisions 3–9 generally aligned w/int'l codes except for materials w/primary or sub risk of Division 6.1, PG II and III. 	ORM-D–AIR inner packaging quantity limits are specified in § 173.27 and are based on Column (9A) and (9B) values in the HMT, or, in §§ 173.150–173.155 and 173.306, whichever value is more restrictive. They normally exceed the ICAO TI inner packaging quantity limit values for LQ.	Generally, aligned with HMR w/minor differences (<i>e.g.</i> , Division 6.1 and Class 9 materials).	<ul style="list-style-type: none"> • Aerosols/Small receptacles: 30 Kg G. • Inner and outer packaging quantity limits generally aligned with UNMR. 	Generally, aligned with UNMR with minor vessel-unique requirements.