



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

JUL 2 1999

Mr. Benjamin W. Taylor
Hazardous Materials Coordinator
ABX Air, Incorporated
145 Hunter Drive, Building 207
Wilmington, OH 45177

Ref. No. 99-0118

Dear Mr. Taylor:

This is in response to your letter dated May 6, 1999, concerning the requirements for notification of the pilot-in-command of the presence of hazardous materials aboard an aircraft. Specifically, you ask if it is acceptable to round up minute quantities to the next thousandth unit of measure for the purposes of the pilot notification, as prescribed in § 175.33 of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180).

The HMR contains no provision that requires the total quantities of all packages for the pilot notification. Section 175.33(a)(3) requires that the total quantities are stated for each package. If you choose, also, to provide information on the aggregate quantity or aggregate gross weight, there is no provision in the HMR that prevents the rounding up of minute quantities to the nearest thousandth of a unit of measure.

I hope this information is helpful. If you have further questions, please do not hesitate to contact this office.

Sincerely,

Thomas G. Allan
Acting Director, Office of Hazardous
Materials Standards



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**AIRBORNE
EXPRESS**

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May 6, 1999

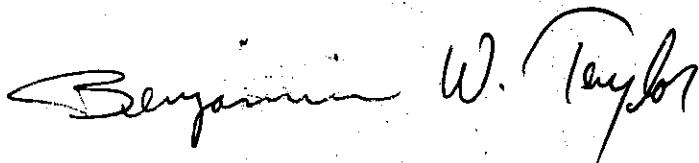
Edward Mazzula,
Director of Hazardous Materials
Standards Division, DHM-10
Department of Transportation
400 7th Street S. W.
Washington, D.C. 20590

Dear Sir,

We would like an Official Interpretation regarding the completion of the Pilot Notification Form in regards to entering a total quantity. Many Hazardous Material shipments we received during our nightly sort operations are shipped in very minute quantities (i.e. Class 6.2 listed as 0.000505 with quantifiers as g, kgs, cc, or ml). Note that this is not limited to just the 6.2 Class, but does not apply to Class 7 and those commodities for which there are no quantity limitations. When we receive numerous of these shipments for even one Outbound Flight the adding up of these numbers is both tedious and time consuming; as well as requiring a lot of space on the Pilot Notification Form just to make the entry.

The question we have and need a written opinion on is this, would it be acceptable to round up to the nearest thousandth or must it be 100% accurate when making these entries on the Pilot Notification Form?

Sincerely,



Benjamin W. Taylor
Hazardous Material Coordinator
ABX Air, Inc.
145 Hunter Drive
Bldg. 207
Wilmington, OH 45177

ext 2002