

SUBJECT 6

Re: Adhesives Group

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Proponent: Freight Classification Development Council

Present Classification Provisions

Item	Description	Class
4605	ADHESIVES GROUP:	
4615	Adhesives , hot melt, in rolled sheets, in boxes.....	110
4620	Adhesives , NOI, Adhesive Cements , NOI, Adhesive Glues , NOI, or Adhesive Pastes , NOI, not required by the U.S. Department of Transportation to bear a Hazard Class or Hazard Division label or placard, see Notes, items 4621 and 4622, in bags, boxes, drums, pails, intermediate bulk containers (IBCs), portable tanks or Packages 1398, 2213, 2399, 2440, 2445, 2452, 2458, 2463, 2467, 2478, 2496, 2499, 2500, 2515, 2516, 2521, 2526, 2528 or 2530, subject to Item 170 and having a density in pounds per cubic foot of:	
Sub 1	Less than 20.....	85
Sub 2	20 or greater	60
4621	NOTE—Does not apply on materials regulated by the U.S. Department of Transportation as hazardous and required to bear a Hazard Class or Hazard Division label or placard. For classes applicable to such hazardous materials, see provisions elsewhere in this Classification.	
4622	NOTE—Also applies when one flat applicator for each inner container is included in the shipment.	
4630	Adhesives or Epoxy Resins , electrically conductive, containing gold or silver, see Notes, items 4631 and 4632, in pails or boxes:	
Sub 1	Actual value not exceeding \$30.00 per pound, see Note, item 4633.....	300
Sub 2	Actual value exceeding \$30.00 per pound, see Note, item 4633.....	500
4631	NOTE—Also applies when cups, plastic bags or mixing sticks are included for each inner container in the shipment.	
4632	NOTE—Applies whether or not gold or silver is premixed with the adhesive or epoxy resin.	
4633	NOTE—Shipper must certify on shipping orders and bills of lading at time of shipment the actual value per pound of the property or the value group embracing the actual value per pound of the property. If the shipper fails to so certify the actual value, shipment will not be accepted, but if the shipment is inadvertently accepted, charges will initially be assessed on the basis of the class for the highest valuation provided. Upon proof of lower actual value, freight charges will be adjusted accordingly.	
4635	Adhesives , synthetic resin, consisting of paper coated or impregnated with synthetic resin adhesive, in boxes or drums.....	77.5
4637	Glue , casein, dry, in bags or drums, or liquid, in drums.....	60

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Proposed Classification Provisions

Item	Description	Class
⇒A-NEW	Adhesives, NOI, Adhesive Cements, NOI, Adhesive Glues, NOI, or Adhesive Pastes, NOI , not required by the U.S. Department of Transportation to bear a Hazard Class or Hazard Division label or placard, see Note, item B-NEW, in bags, boxes, drums, pails, intermediate bulk containers (IBCs), portable tanks or Packages 1398, 2213, 2399, 2440, 2445, 2452, 2458, 2463, 2467, 2478, 2496, 2499, 2500, 2515, 2516, 2521, 2526, 2528 or 2530, subject to Item 170 and having a density in pounds per cubic foot of:	
Sub 1	Less than 15.....	100
Sub 2	15 but less than 22.5.....	70
Sub 3	22.5 but less than 30.....	65
Sub 4	30 or greater.....	55
⇒B-NEW	NOTE—Does not apply on materials regulated by the U.S. Department of Transportation as hazardous and required to bear a Hazard Class or Hazard Division label or placard. For classes applicable to such hazardous materials, see provisions elsewhere in this Classification.	
4605	ADHESIVES GROUP:	⇒Cancel; no further application
4615	Adhesives , hot melt, in rolled sheets, etc.....	⇒Cancel; see item A-NEW
4620	Adhesives, NOI, Adhesive Cements, NOI, Adhesive Glues, NOI, or Adhesive Pastes, NOI , not required by the U.S. Department of Transportation to bear a Hazard Class or Hazard Division label or placard, see Notes, items 4621 and 4622, etc.....	⇒Cancel; see item A-NEW
4621	NOTE—	⇒Cancel; see item B-NEW.
4622	NOTE—	⇒Cancel; no further application.
4630	Adhesives or Epoxy Resins , electrically conductive, containing gold or silver, see Notes, items 4631 and 4632, etc.....	⇒Cancel; believed to be obsolete
4631	NOTE—	⇒Cancel; no further application.
4632	NOTE—	⇒Cancel; no further application.
4633	NOTE—	⇒Cancel; no further application.
4635	Adhesives , synthetic resin, consisting of paper coated or impregnated with synthetic resin adhesive, etc.....	⇒Cancel; see item A-NEW
4637	Glue , casein, etc.....	⇒Cancel; see item A-NEW

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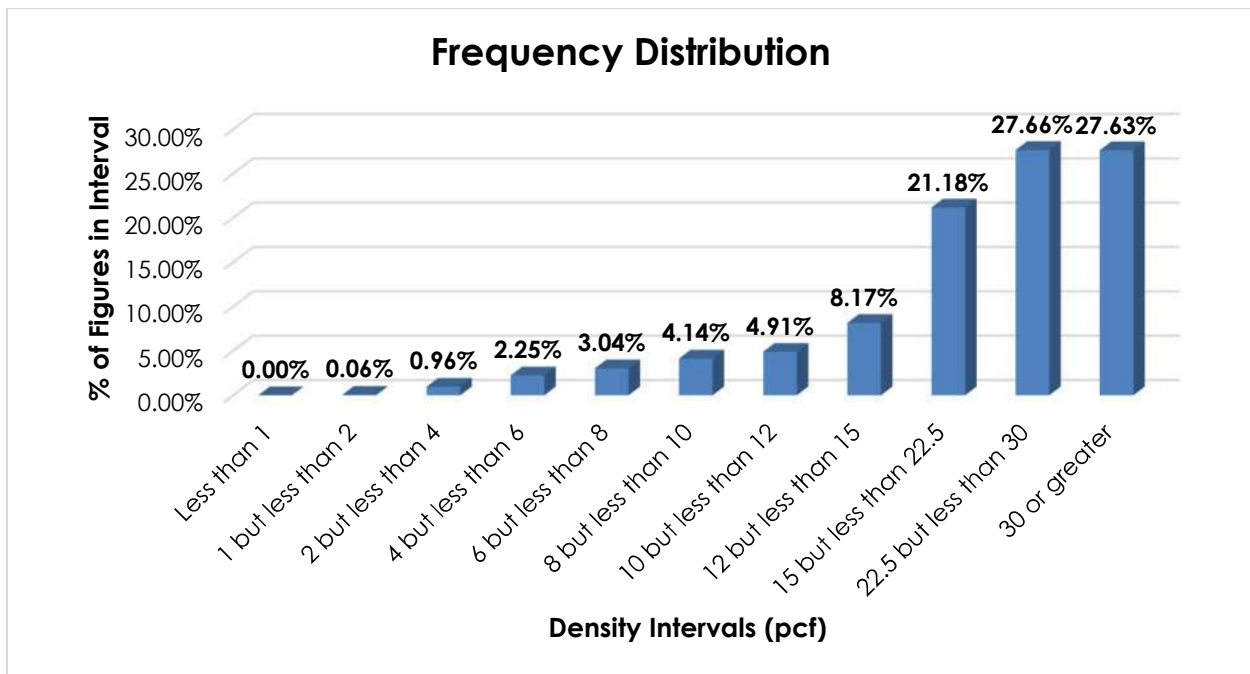
Analysis

Introduction

This proposal is based the information developed during a review of the Adhesives Group.

Transportation Characteristics

Density—The information of record includes 52,428 density observations obtained from the FCDC's Density Study¹. The densities range from 1.51 to 77.23 pcf, with an overall average density of 24.90 pcf. As shown in the graph below, the density distribution is left-skewed, with over 76% of the figures 15 pcf or greater. Density breaks at 15, 22.5 and 30 pcf address the spread and modality of the distribution.



When the data is evaluated based on the proposed density breaks at 15, 22.5 and 30 pcf, the density ranges and averages shown in the table below emerge.

Density Group (pcf)	Density Range (pcf)	Average Density (pcf)
Less than 15	1.51 – 14.99	10.09
15 but less than 22.5	15.00 – 22.49	18.85
22.5 but less than 30	22.50 – 29.99	26.22
30 or greater	30.00 – 77.23	40.01

¹ The Density Study is part of an ongoing effort by the FCDC to collect information on actual shipments across all product categories handled by the LTL industry. Carriers that choose to participate in the Study periodically submit shipment data captured through their respective freight auditing programs. The FCDC uses verifiable data points, identified by NMFC item, that include the weight and the dimensions and/or cube of the shipping unit.

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Handling, Stowability and Liability—Care must be taken to avoid stowing some adhesives with food or feed or other freight that may be contaminated. However, there have been no reports of unusual or significant handling, stowability or liability issues.

Conclusion

Based on the foregoing analysis, this proposal would cancel items 4615, 4620, 4635 and 4637 with reference to a new item, naming “Adhesives, NOI, Adhesive Cements, NOI, Adhesive Glues, NOI, or Adhesive Pastes, NOI.” The item would be restricted to adhesives not regulated as hazardous by the U.S. Department of Transportation, and would assign classes predicated on density, with breaks at 15, 22.5 and 30 pcf². The table below relates the information of record to the proposed density groupings and FCDC guidelines.

Density Group (pcf)	Average Density (pcf)	FCDC Minimum Average Density Guideline (pcf)	Class Based on FCDC Density Guidelines
Less than 15	10.09	9	100
15 but less than 22.5	18.85	15	70
22.5 but less than 30	26.22	22.5	65
30 or greater	40.01	35	55

Note, item 4621 would be canceled with reference to a new Note attendant to the new item.

Item 4630, applying on “Adhesives or Epoxy Resins, electrically conductive, containing gold or silver,” would be canceled as obsolete. Notes, items 4622, 4631, 4632 and 4633 would be canceled as having no further application, as would the generic heading, item 4605.

² The density provisions would include reference to Item (Rule) 170, the inadvertence clause.