

SUBJECT 23

Re: Charcoal, Charcoal Briquettes or Charcoal Pellets, including Carbon Briquettes — Items 40570, 42445 and 42450

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Proponent: Freight Classification Development Council

Present Classification Provisions

Item	Description	Class
40570	CARBON: subject to item 40550 Briquettes , NOI, in bags, boxes or drums	50
42445	Charcoal, Charcoal Briquettes or Charcoal Pellets , NOI, not activated, not required by the U.S. Department of Transportation to bear a Hazard Class or Hazard Division label or placard, see Note, item 42446, in bags or boxes, subject to Item 170 and having a density in pounds per cubic foot of:	
Sub 1	Less than 15.....	92.5
Sub 2	15 or greater	70
42446	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.	
42450	Charcoal or Charcoal Briquettes , coconut shell, nut shell, NOI, or fruit pit, not activated, not required by the U.S. Department of Transportation to bear a Hazard Class or Hazard Division label or placard, see Note, item 42451:	
Sub 1	In containers in boxes	85
Sub 2	In bags, or in bulk in boxes or drums	65
42451	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.	

Proposed Classification Provisions

Item	Description	Class
40570	CARBON: subject to item 40550 Briquettes , NOI, etc	⇒Cancel; see item 42445

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Proposed Classification Provisions — Concluded

Item	Description	Class
42445	Charcoal, Charcoal Briquettes or Charcoal Pellets , NOI, not activated, not required by the U.S. Department of Transportation to bear a Hazard Class or Hazard Division label or placard, see Note, item 42446, in bags or boxes, subject to Item 170 and having a density in pounds per cubic foot of:	
⇒Sub 1	Less than 10.....	110
⇒Sub 2	10 but less than 15.....	85
⇒Sub 3	15 but less than 30.....	70
⇒Sub 4	30 or greater.....	60
42446	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.	
42450	Charcoal or Charcoal Briquettes , coconut shell, nut shell, NOI, or fruit pit, not activated, not required by the U.S. Department of Transportation to bear a Hazard Class or Hazard Division label or placard, etc.....	⇒Cancel; see item 42445
42451	NOTE—⇒Cancel; no further application.	

Analysis

Introduction

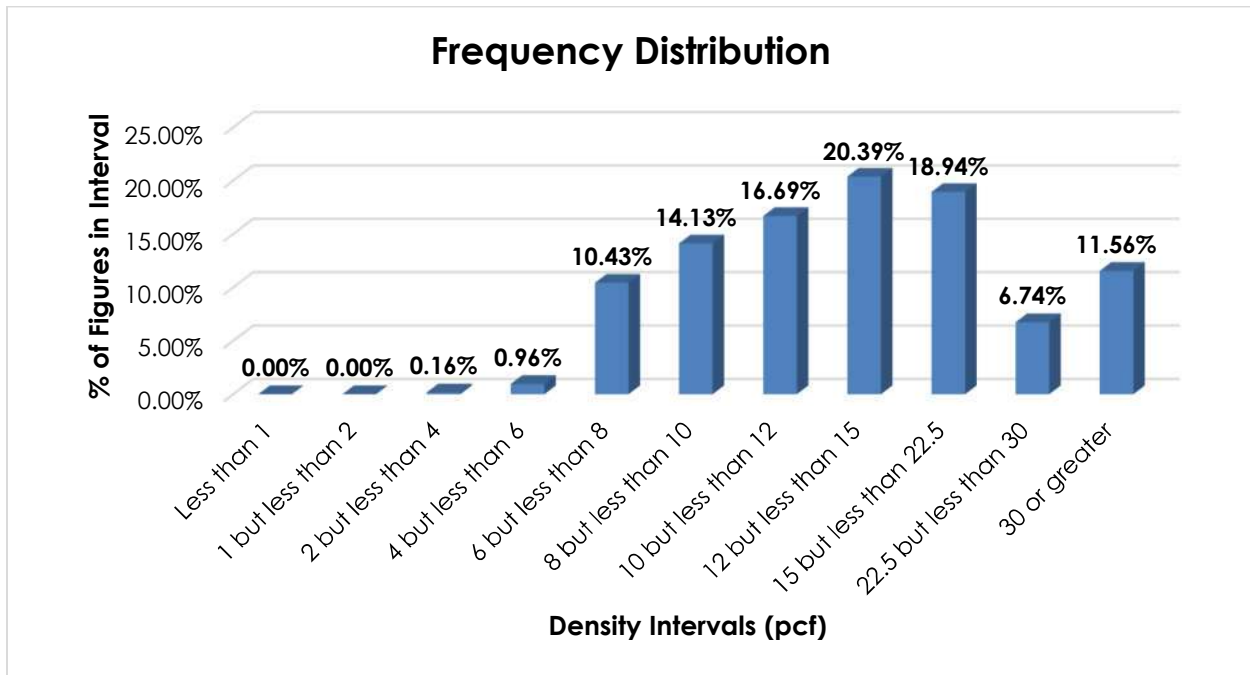
This proposal is in response to evidence that charcoal briquettes, which are currently named in items 42445 and 42450, are being misclassified and moving under item 40570, naming carbon briquettes. Research indicates that carbon briquettes are sources of fuel that consist of a combination of carbonized waste products, including spent charcoal¹; however, they are employed in similar ways to charcoal briquettes. Therefore, this proposal encompasses a review of the transportation characteristics of items 40570, 42445 and 42450.

¹ Amaya, Alejandro, Natalia Medero, Néstor Tancredi, Hugo Silva, and Cristina Deiana. "Activated Carbon Briquettes from Biomass Materials." *Bioresource Technology* 98, no. 8 (2007): 1635–41. <https://doi.org/10.1016/j.biortech.2006.05.049>.

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Transportation Characteristics

Density—The information of record includes 623 density observations submitted by a shipper and obtained from the FCDC’s Density Study². The densities range from 3.31 to 48.64 pcf, with an overall average density of 15.92 pcf. As shown in the graph below, the density distribution shows relatively uniform clustering between 10 and 22.5 pcf, and a distinct peak in the 30 pcf or greater interval. Density breaks at 10, 15 and 30 pcf address both the spread and modality of the distribution.



When the data is evaluated on the basis of the four proposed density groupings, the density ranges and averages shown in the table below emerge.

Density Group (pcf)	Density Range (pcf)	Average Density (pcf)
Less than 10	3.31 – 9.98	8.03
10 but less than 15	10.00 – 14.90	12.27
15 but less than 30	15.00 – 29.90	20.56
30 or greater	30.05 – 48.64	34.84

Handling, Stowability and Liability—There have been no reports of unusual or significant handling, stowability or liability concerns.

² 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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Conclusion

Based on the foregoing analysis, this proposal would cancel items 40570 and 42450 with reference to item 42445 in the interest of clarification and simplification, and to address interpretive issues. Concurrently, the modified density scale in item 42445 would be amended to provide density breaks at 10, 15 and 30 pcf³, with classes reflective of the average density of each grouping, as shown in the table below.

Density Group (pcf)	Average Density (pcf)	FCDC Minimum Average Density Guideline (pcf)	Class Based on FCDC Density Guidelines
Less than 10	8.03	8	110
10 but less than 15	12.27	12	85
15 but less than 30	20.56	15	70
30 or greater	34.84	30	60

Note, item 42451 would be canceled with no further application.

³ The density provisions include reference to Item (Rule) 170, the inadvertence clause.