

SUBJECT 7

Re: Asphalt Group

Contact: Angela L. Li Telephone — (703) 838-1882 angela.li@nmfta.org

Proponent: Freight Classification Development Council

Present Classification Provisions

Item	Description	Class
15200	ASPHALT GROUP: Articles consist of Asphalt, Pitch or Tar, as described in items subject to this grouping.	
15220	Asphalt (Asphaltum), natural, by-product or petroleum, liquid, other than paint, stain or varnish and not required by the U.S. Department of Transportation to bear a Hazard Class or Hazard Division label or placard, see Note, item 15221, in containers in boxes, or in drums, pails or Package 2080	55
15221	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.	
15240	Asphalt (Asphaltum), natural, by-product or petroleum, solid, see Note, item 15242, in packages	55
15242	NOTE—Asphalt or pitch, the melting point of which is 140 degrees or less Fahrenheit, as determined by the Ball and Ring test in water or by the ½ inch Cube test in water, must be in metal cans in boxes or crates, or in steel drums. Asphalt or pitch may be shipped in eight-ply fiber drums, each ply testing not less than 100 pounds (Mullen), total wall thickness not less than ⅛ inch, with metal tops and bottoms, or in 3 ½-gallon nonreusable pails made of 28-gauge steel, covers securely fastened with lugs.	
15260	Pitch, brewers' or pine, in bags, boxes or drums	55
15270	Pitch, lignin, dry, see Note, item 15272, in bags or drums	55
15272	NOTE—Lignin pitch is dehydrated or powdered lignin liquor.	
15280	Pitch, montan, in bags	55
15300	Pitch, NOI, ground, in bags or drums	55
15310	Pitch, NOI, not ground, see Note, item 15242, in boxes, crates or drums, or in bulk in packages	55
15320	Pitch, tall oil, in drums	55
15360	Tar or Pitch, candle, in drums	55
15380	Tar, coal or petroleum, not required by the U.S. Department of Transportation to bear a Hazard Class or Hazard Division label or placard, see Note, item 15221, in metal cans in boxes, or in drums or pails, see Note, item 15382.....	55
15382	NOTE—Will also apply on solid coal or petroleum tar, the melting point of which is over 140 degrees Fahrenheit, as determined by the Ball and Ring test in water or by the ½ inch Cube test in water, when shipped in fiber drums.	
15400	Tar, hardwood, in drums	55

SUBJECT 7

Present Classification Provisions — Concluded

Item	Description	Class
	ASPHALT GROUP: subject to item 15200	
15420	Tar , NOI, not required by the U.S. Department of Transportation to bear a Hazard Class or Hazard Division label or placard, see Note, item 15221, in metal cans in boxes, or in drums55	
15440	Tar , pine, in containers in boxes or drums, or metal cans in crates, or in bulk in drums55	

Proposed Classification Provisions

Item	Description	Class
15200	ASPHALT GROUP⇒Cancel; no further application	
15220	Asphalt (Asphaltum) , natural, by-product or petroleum, liquid, etc..... ⇒Cancel; see item A-NEW	
15221	NOTE—⇒Cancel; see item B-NEW.	
15240	Asphalt (Asphaltum) , natural, by-product or petroleum, solid, etc. ⇒Cancel; see item A-NEW	
15242	NOTE—⇒Cancel; no further application.	
15260	Pitch , brewers' or pine, etc ⇒Cancel; see item A-NEW	
15270	Pitch , lignin, dry, etc ⇒Cancel; see item A-NEW	
15272	NOTE—⇒Cancel; no further application.	
15280	Pitch , montan, etc..... ⇒Cancel; see item A-NEW	
15300	Pitch , NOI, ground, etc ⇒Cancel; see item A-NEW	
15310	Pitch , NOI, not ground, etc..... ⇒Cancel; see item A-NEW	
15320	Pitch , tall oil, etc ⇒Cancel; see item A-NEW	
15360	Tar or Pitch , candle, etc..... ⇒Cancel; see item A-NEW	
15380	Tar , coal or petroleum, etc..... ⇒Cancel; see item A-NEW	
15382	NOTE—⇒Cancel; no further application.	
15400	Tar , hardwood, etc..... ⇒Cancel; see item A-NEW	
15420	Tar , NOI, etc ⇒Cancel; see item A-NEW	
15440	Tar , pine, etc ⇒Cancel; see item A-NEW	

SUBJECT 7

Proposed Classification Provisions — Concluded

Item	Description	Class
⇒A-NEW	Asphalt , NOI, other than paint, stain or varnish; or Pitch or Tar , 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, pails or drums, subject to Item 170 and having a density in pounds per cubic foot of:	
Sub 1	Less than 22.5.....	85
Sub 2	22.5 but less than 30.....	65
Sub 3	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.	

Analysis

Introduction

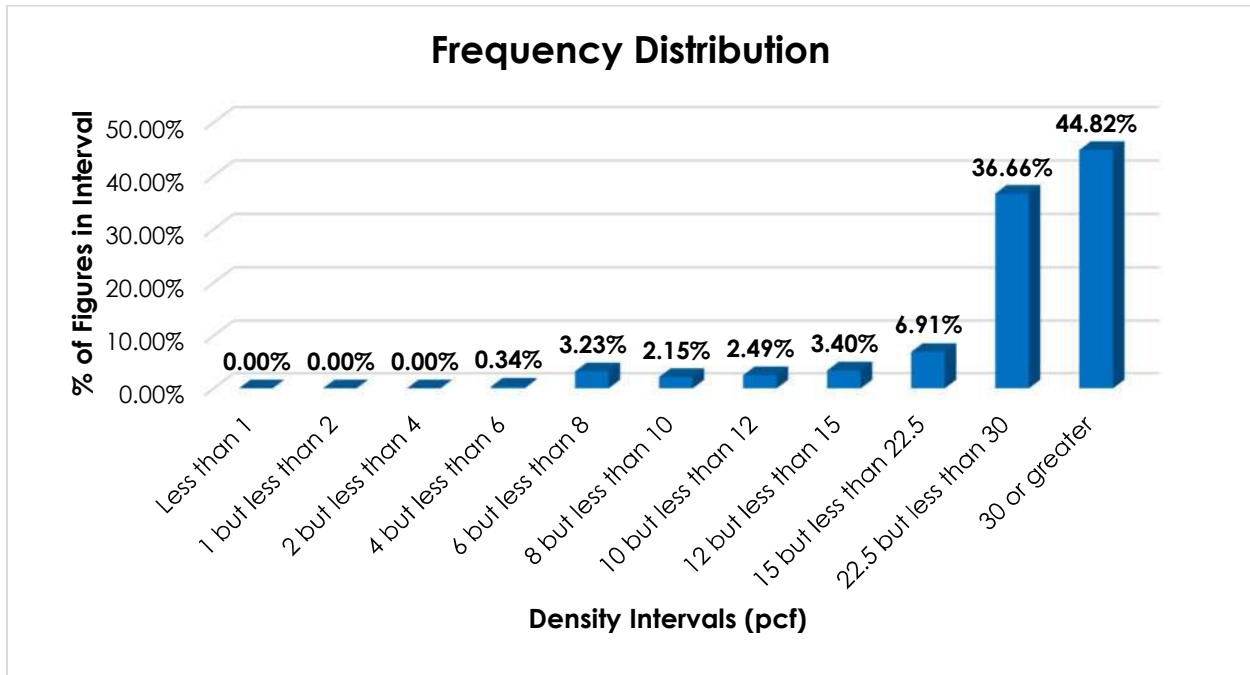
All of the items in the Asphalt Group name particular types of asphalt, pitch, or tar, and these provisions can be difficult to interpret, apply, or verify. The transportation characteristics below relate to the items subject to the Asphalt Group, as shown in the Present Classification Provisions herein.

Transportation Characteristics

Density—The information of record includes 1,765 density observations obtained from the FCDC’s Density Study¹. The densities range from 5.79 to 81.75 pcf, with an overall average density of 24.60 pcf. As shown in the graph on the following page, the density distribution is left-skewed, with over 88% of the figures being 15 pcf or greater. Density breaks at 22.5 and 30 pcf reflect the modality and spread of the distribution.

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.

SUBJECT 7



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

Density Groups (pcf)	Density Range (pcf)	Average Density (pcf)
Less than 22.5	5.79 – 22.45	13.32
22.5 but less than 30	22.50 – 29.70	24.67
30 or greater	30.13 – 81.75	40.61

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

Conclusion

Based on the foregoing analysis, all of the items in the Asphalt Group would be canceled with reference to a new item, naming “Asphalt, NOI, other than paint, stain or varnish; or Pitch or Tar, NOI.” The item would be restricted to asphalt, pitch or tar not regulated as hazardous by the U.S. Department of Transportation, and would provide classes predicated on density, with breaks at 22.5 and 30 pcf. The table on the following page shows the average densities and minimum average density guidelines for each density group.

SUBJECT 7

Density Groups (pcf)	Average Density (pcf)	FCDC Minimum Average Density Guideline (pcf)	Class based on FCDC Density Guidelines
Less than 22.5	13.32	12	85
22.5 but less than 30	24.67	22.5	65
30 or greater	40.61	35	55

Note, item 15221 would be canceled with reference to a new Note attendant to the new item. Additionally, Notes, items 15242, 15272 and 15382 would be canceled with no further application.

The minimum packaging requirements would ensure that freight is adequately protected and can be handled and stowed in a manner that is reasonably safe and practicable so as to withstand the normal rigors of the less-than-truckload environment.