



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

January 10, 2025

Larry D. Buffey
Dangerous Goods Compliance Leader
AdvanSix Inc.
Attn: Wenfang Chen
300 Kimball Drive Suite 100
Parsippany, NJ 07054

Reference No. 24-0091

Dear Mr. Buffey:

This letter is in response to your September 19, 2024, email and subsequent conversations requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to combustible liquid provisions. Specifically, you ask whether non-bulk, bulk, and reportable quantities of “UN1915, Cyclohexanone, 3, PG III” that meet the reclassification requirements for a combustible liquid would qualify for certain combustible liquid exceptions under § 173.150(f).

If “UN1915, Cyclohexanone, 3, PG III” is properly reclassified as a combustible liquid, shipped in non-bulk packaging, and does not meet the definition of a hazardous substance, hazardous waste, or marine pollutant, the exceptions in § 173.150(f)(2) apply when transported by highway or rail—i.e., the requirements in the HMR do not apply. However, if “UN1915, Cyclohexanone, 3, PG III” is properly reclassified as a combustible liquid and is shipped in bulk packaging or meets the definition of a hazardous substance, hazardous waste, or marine pollutant, the provisions in § 173.150(f)(3) apply when shipped by highway or rail—which provide limited exceptions while maintaining certain requirements including, but not limited to, shipping papers, marking of packages, and placarding when applicable.

I hope this information is helpful. Please contact us if we can be of further assistance.

Sincerely,

Steven Andrews
Acting Chief, Regulatory Review and Reinvention Branch
Standards and Rulemaking Division

Jones, Jessie Jane CTR (PHMSA)

From: INFOCNTR (PHMSA)
Sent: Monday, October 7, 2024 2:48 PM
To: Dodd, Alice (PHMSA)
Cc: Hazmat Interps
Subject: FW: Request for a letter of interpretation for Cyclohexanone UN1915 and the Combustible liquid exemption 173.150(f)

Follow Up Flag: Follow up
Flag Status: Flagged

Good Afternoon Alice,

See the interpretation request below. Let us know if you need anything else.

Best,
Aminah

From: Buffey, Larry <Larry.Buffey@advansix.com>
Sent: Monday, October 7, 2024 12:36 PM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Subject: Re: Request for a letter of interpretation for Cyclohexanone UN1915 and the Combustible liquid exemption 173.150(f)

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Mailing address:
Attn: Larry Buffey
634 SW 12th Street
Cape Coral, FL 33991

Larry D. Buffey Jr

Principle Product Stewardship Leader; Dangerous Goods Compliance Leader

AdvanSix Inc.

Office: +1 (973) 526-1633

Business Cell: +1 (810) 931-0280

PCell: +1 (810) 624-9935

Larry.Buffey@Advansix.com

AdvanSix.com

From: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>

Sent: Thursday, September 26, 2024 2:54 PM

To: Buffey, Larry <Larry.Buffey@advansix.com>

Subject: RE: Request for a letter of interpretation for Cyclohexanone UN1915 and the Combustible liquid exemption 173.150(f)

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Report Suspicious

Dear Mr. Buffey,

We have received your request for a written letter of interpretation regarding the hazardous materials regulations (49 CFR Parts 171–180). The hazardous materials regulations are available at the following URL:

https://www.ecfr.gov/cgi-bin/text-idx?SID=1d49a3b137cb1b6fc45251074e634b44&tpl=/ecfrbrowse/Title49/49tab_02.tpl
[ecfr.gov]

However, before we can submit your request for processing, please respond to this email with:

- Physical Mailing Address

Sincerely,

Aminah, Hazardous Materials Specialist

An e-mail response from this office is considered informal guidance. Formal guidance may be requested in accordance with 49 CFR 105.20. <https://www.phmsa.dot.gov/standards-rulemaking/hazmat/hazardous-materials-information-center> [phmsa.dot.gov]

From: Buffey, Larry <Larry.Buffey@advansix.com>

Sent: Thursday, September 19, 2024 8:47 AM

To: PHMSA HM InfoCenter <PHMSAHMInfoCenter@dot.gov>

Subject: Request for a letter of interpretation for Cyclohexanone UN1915 and the Combustible liquid exemption 173.150(f)

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Good morning,

MY name is Larry Buffey and I work for a chemical manufacturer. We produce and ship Cyclohexanone globally. We have recently taken advantage of the ability to reclassify Cyclohexanone under the 173.150 (f) Exemption. We ship in Bulk and Non-bulk. We have a drumming facility that is expressing the concern that the non-bulk packaging still requires the Combustible Liquid Marking on the Drum.

The question is if Cyclohexanone is still considered a hazardous material or not, and whether the Non-bulk packaging is required to display markings.

Here is how AdvanSix understands the regulation as follows,

UN1915, Cyclohexanone is a flammable liquid with a FP of 44°C / BP 155.6°C (according to our [SDS \[advansix.store\]](#)), and it meets the classification criteria as a hazardous material (PG III).

It is authorized in the hazmat table to be shipped under the exceptions of §173.150. That allows Nadone to be shipped as a limited quantity in inner packagings up to 5L each and it provides the option of reclassifying it to a combustible liquid.

As you know a flammable liquid MAY be reclassified as a combustible liquid for domestic ground transportation if the flash point is $\geq 38^{\circ}\text{C}$. This provides an exemption from marking, labeling, UN specification packaging and shipping papers. It is an option.

UN1915 shipped under an exception (combustible liquid) is still a hazardous material but it can be shipped as “not regulated”. However, if it is transported by air or vessel, it must be transported as UN1915, Cyclohexanone as combustible liquid is not recognized by those modes of transport.

I am requesting a formal letter of interpretation on this topic. Please contact me for any question you may have regarding this.

Larry D. Buffey Jr

Principle Product Stewardship Leader; Dangerous Goods Compliance Leader

AdvanSix Inc.

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Business Cell: +1 (810) 931-0280

PCell: +1 (810) 624-9935

Larry.Buffey@Advansix.com

AdvanSix.com