



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, DC 20590

April 8, 2025

Jennifer Kuo  
Teledyne Scientific & Imaging  
1049 Camino Dos Rios  
Thousand Oaks, CA 91360

Reference No. 25-0017

Dear Ms. Kuo:

This letter is in response to your February 11, 2025 email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the use of the United Nations (UN) identification number and proper shipping name “UN1396, Aluminum powder, uncoated.” Specifically, you ask if there is a particle size limit with respect to the use of this hazardous materials description.

No. While certain hazardous materials descriptions and proper shipping names in the § 172.101 Hazardous Materials Table (HMT) limit use of the entry (*e.g.*, a concentration range, particle size, energy capacity, *etc.*), the entry for “UN1396, Aluminum powder, uncoated” does not specify limiting criteria for particle size. Furthermore, the test method in the UN Manual of Tests and Criteria do not specify a particle size. Hazardous materials that may be dangerous when wet, such as aluminum powder, uncoated, are classified based on the results of testing (*i.e.*, UN Test N.5, *Test method for substances which in contact with water emit flammable gases*, see Section 33.5 of the UN Manual of Tests and Criteria) irrespective of particle size.

Ultimately, as provided in § 173.22, it is the shipper’s responsibility to properly classify and describe a hazardous material based on the classification criteria provided in the HMR.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Dirk Der Kinderen".

Dirk Der Kinderen  
Chief, Standards Development Branch  
Standards and Rulemaking Division

**From:** [INFOCNTR \(PHMSA\)](#)  
**To:** [Dodd, Alice \(PHMSA\)](#)  
**Cc:** [Hazmat Interps](#)  
**Subject:** FW: Request for letter of interpretation  
**Date:** Wednesday, February 12, 2025 12:02:33 PM

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Good afternoon Alice,

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

Best,  
Aminah

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**From:** Kuo, Jennifer (US) <Jennifer.Kuo@Teledyne.com>  
**Sent:** Tuesday, February 11, 2025 3:59 PM  
**To:** INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>  
**Subject:** Request for letter of interpretation

You don't often get email from [jennifer.kuo@teledyne.com](mailto:jennifer.kuo@teledyne.com). [Learn why this is important](#)

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Hello,

I would like to request a letter of interpretation on the specific description of UN 1396, Aluminum powder, uncoated. I am looking for the particle size that this UN number covers. Specifically, I would like to know how large a particle is considered a powder with respect to this UN designation. I have not been able to find the particle size defined for this particular chemical.

Please send the information to:

Jennifer Kuo  
Teledyne Scientific  
1049 Camino Dos Rios  
Thousand Oaks, CA 91360  
(805)373-4536  
[Jennifer.Kuo@teledyne.com](mailto:Jennifer.Kuo@teledyne.com)

Please let me know if you have questions on my request.

Thank you,  
Jennifer Kuo

[Jennifer.Kuo@teledyne.com](mailto:Jennifer.Kuo@teledyne.com)

(805)373-4536

Teledyne Scientific & Imaging

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