

ATTN: Department of Transportation Pipeline Hazardous Materials and Safety Administration Office of Hazardous Materials Safety 1200 New Jersey Avenue, SE Washington, DC 20590

13 April 2025

Dear DOT,

Thank you for your time today and the department's guidance over the past few months related to our company's inquiry.

gChem is a domestic manufacturer of dimethyl sulfoxide, DMSO (CAS# 67-68-5), an environmentally friendly and safer solvent possessing a closed cup flashpoint of 87C. Based on the guidance provided under 49 CFR 173.120 section B(3) and discussions with your department's Customer Service team, it is Gaylord's understanding that "a combustible liquid that does not sustain combustion is not subject to the requirements of this subchapter as a combustible liquid. Either the test method specified in ASTM D 4206 or the procedure in appendix H of this part may be used to determine if a material sustains combustion when heated under test conditions and exposed to an external source of flame."

Gaylord conducted testing on DMSO according to ASTM D 4206 and determined that DMSO does not sustain combustion. Based on these test results, Gaylord intends to classify DMSO, regardless of package size, as Non-Regulated under Section 14: Transportation Information of DMSO's product SDS. The results of the testing conducted are included in this document for reference.

Gaylord is seeking confirmation from DOT that the approach outlined above is in-line with DOT combustible liquid regulations and best practices.

Sincerely,

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Artie S. McKim PhD

Vice President, Technology

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Report

Prepared for Gaylord Chemical Company, LLC.

Dynalene Lab Services # 6630 Date: 28 March 2025

Company Info	Gaylord Chemical Company, LLC. 1404 Greengate Drive Suite 100 Covington, LA 70433
Sample Receipt	March 20 th , 2025
Report Generated by	Michael Irelan
Report Verified by	Name: George Giannaras Signature:
Test description	Sustained Burning (ASTM D4206).

Results

,	Burning Characteristics*		
	DMSO Lot No. IND250224	Sample did not sustain burning.	

^{*-}Sample was tested at 49°C.

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