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Sent: Wednesday, May 14, 2025 1:06 PM

To: Dodd, Alice (PHMSA) Alice.Dodd@dot.gov>

Subject: Request for Interpretation – Applicability of 49 CFR §178.605 Hydrostatic Pressure Testing to UN3082, PG III When Shipped by Air (Domestic or international)

Dear PHMSA Office of Hazardous Materials Standards,

I hope this message finds you well.

I am writing to respectfully request a formal interpretation regarding the applicability of hydrostatic pressure testing requirements under **49 CFR §178.605** for **UN3082**,

Environmentally hazardous substance, liquid, n.o.s., Packing Group III, when packaged in **UN-certified plastic pails** and transported **by air**.

Specifically, I would like clarification on the following:

Does the exception stated in §173.27(c)(2)—which exempts packagings for UN3082 from the air transport-specific pressure performance standards—also apply to the hydrostatic pressure testing requirements outlined in **§178.605** for UN performance packaging?

In other words, if UN3082 PG III is being shipped by air in a UN-certified plastic pail (e.g., 1H2), does the packaging still need to pass the hydrostatic pressure test (typically 100 kPa) required by §178.605, or is it exempted due to the exception noted in §173.27(c)(2)?

Your guidance is appreciated to ensure proper compliance with the applicable hazardous materials regulations.

Thank you in advance for your assistance.

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