
From: [REDACTED]
Sent: Monday, June 23, 2025 11:40 AM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Subject: LETTER OF INTERPRETATION REQUEST

Good morning,

We have an inquiry regarding the DG classification law and would appreciate your assistance in clarifying its requirements.

Beginning of 2025 updated regulations for the transport of dangerous goods (IATA/IMDG) has been published and the implemented updates include a change in classification for **TMAH (Tetramethylammonium hydroxide) and its solutions.**

The recognized toxicity of TMAH is going to be introduced for all existing proper shipping names along with the limitation to aqueous solutions. Additionally, a new proper shipping name (UN 3560) for aqueous solutions with >25% TMAH and classification criteria for other (non-aqueous) TMAH solutions are going to be introduced.

We have a question about the non-aqueous solution. It is mentioned in the text

- Other formulation containing **a surfactant** > 1% and ≥ 8.75% TMAH à UN2927, toxic liquid, corrosive, PG I
- Other formulation containing **a surfactant** > 1% and > 2.38% - < 8.75% TMAH à UN2927, toxic liquid, corrosive, PG II

We would like to get a **letter of interpretation** on the definition of the term “surfactant” in UN2927 classification?

(Is it only substances that have hydrophobic-hydrophilic capability OR all substances that can potentially accelerate dermal uptake? Any other way the term should be defined?...)

Thank you in advance for your help

Regards

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