



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, DC 20590

March 12, 2026

Manuel Alejandro  
Dangerous Goods of America, Inc.  
DGA Hazmat App LLC  
10400 NW 33rd St, Suite 230  
Doral, FL 33172

Reference No. 25-0030

Dear Mr. Alejandro:

This letter is in response to your March 14, 2025 email and subsequent phone conversation with a member of my staff requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to lithium batteries installed in life-saving appliances. In your email, you describe self-inflating life vests with beacons—each containing between 1 g and 2 g of lithium metal—offered for transportation by air.

We have paraphrased and answered your questions as follows:

- Q1. Is the lithium battery mark—specified in § 173.185(c)(3)(i)—required on an article described “UN2990, Life-saving appliances, self-inflating?”
- A1. No. When the article is properly classed, described, packaged, marked, and labeled, as “UN2990, Life-saving appliances, self-inflating” the mark specified in § 173.185(c)(3)(i) is not applicable. However, under § 173.219(b)(3) the lithium batteries contained in life-saving appliances must be “packed in accordance with § 173.185,” meaning the packaging requirements in § 173.185 apply when offering “UN2990, Life-saving appliances, self--inflating.”
- Q2. When offered for transportation by air, what quantity limitations apply to lithium metal batteries contained in “UN2990, Life-saving appliances, self-inflating?”
- A2. As described in § 173.219(b)(3), lithium batteries included as part of a life-saving appliance must be packed in accordance with § 173.185 and Special Provisions A54 and A101, as applicable. When transported by aircraft, Special Provision A101

restricts the quantity of lithium metal in the batteries contained in any piece of equipment to 12 g per cell and 500 g per battery.

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

Sincerely,

A handwritten signature in blue ink that reads "Alexander Wolcott". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Alexander Wolcott  
Acting Chief, Regulatory Review and Reinvention  
Branch Standards and Rulemaking Division

**From:** [INFOCNTR \(PHMSA\)](#)  
**To:** [Dodd, Alice \(PHMSA\)](#)  
**Cc:** [Hazmat Interps](#); [Baker, Yul \(PHMSA\)](#)  
**Subject:** FW: Request of a Letter of Interpretation  
**Date:** Monday, March 17, 2025 9:46:13

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Good Morning,

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

Best,

Aminah

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**From:** Compliance DGA4U <compliance@dga4u.com>  
**Sent:** Friday, March 14, 2025 4:00 PM  
**To:** Pfund, Duane (PHMSA) <Duane.Pfund@dot.gov>; INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>  
**Cc:** Compliance DGA4U <compliance@dga4u.com>  
**Subject:** Request of a Letter of Interpretation

Some people who received this message don't often get email from [compliance@dga4u.com](mailto:compliance@dga4u.com). [Learn why this is important](#)

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Dear PHMSA;

We are a training facility for the safe transport of hazardous material, there are questions that we are not sure about. Therefore, we ask for clarification:

As you may be aware many evacuation slides, life rafts and life vests assigned to UN2990, Life-saving appliances, self-inflating, in addition to the survival kits hazmat contents in these appliances, they also contain beacons that are powered by lithium metal batteries that most are activated when in contact with water or by person.

Some appliances contain more than two and others do not. The size of these lithium metal batteries in the beacon varies.

- Do these appliances require the lithium battery mark (173.185 Figure 1 to paragraph (c)(3)(i) and does,
- The lithium test summary is required (173.185 (a)(3).

Please find below two Examples:

1. If we are declaring in a shipping paper a **UN2990, Life-saving appliances, self-inflating**, and this Life-saving appliances contains a lithium metal battery in the Beacon that complies with 173.185 (c)(1)(ii).

Does the box require to be marked with the lithium battery mark (173.185 Figure 1 to paragraph (c)(3)(i)?

2. If we are declaring in a shipping paper a **UN2990, Life-saving appliances, self-inflating**, and this Life-saving appliances contains a lithium metal battery in the Beacon that exceeds 1g for a lithium metal cell or 2g for a lithium metal battery.

Does the box require to be marked with the Class 9 Label 172.446 or the Class 9 Label 172.447?

If the Class 9 Label 172.447 applies, will the classification change to **UN 3091, Lithium metal batteries contained in equipment**?

Your kind and prompt reply to this inquiry is very much appreciated.

Thank you,

**Manuel Alejandro**

Dangerous Goods of America, Inc.

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