



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

April 2, 2026

Sona Pithadia
Regulatory & Sustainability Manager
Bona
4275 Corporate Drive
Monroe, NC, 28110

Reference No. 26-0027

Dear Ms. Pithadia:

This letter is in response to your February 20, 2026 email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the classification of pressurized hazardous materials. Specifically, you ask about the classification of a product that: 1) is transported in a pressurized container (*i.e.*, aerosol or bag-on-valve system); 2) is expelled by a propellant that may be a hydrocarbon, or a non-flammable compressed gas (nitrogen/air/CO₂) and; 3) contains a liquid product that may or may not contain flammable components.

We have paraphrased and answered your questions as follows:

- Q1. Does the presence of a pressurized container, or labeling (of a container) with markings such as “contents under pressure” automatically classify a product as a flammable aerosol?
- A1. No. “Aerosol” is defined in § 171.8. Classification of a product as a flammable aerosol is based on the properties of the materials in the packaging (*i.e.*, the pressurized container). The criteria to classify a product as a flammable aerosol is specified in § 173.115(l).
- Q2. Is flammability determined by the packaging format (*e.g.*, pressurized container) or by the finished product formulation and applicable testing criteria (*e.g.*, flash point, ignition/flammability testing)?
- A2. Classification is determined based on the properties of the contents of packaging (*see* answer A1).

Q3. Can a pressurized liquid that is expelled by a non-flammable compressed gas propellant be classified as non-flammable depending on the final formulation and test results?

A3. Yes, depending on the flammability of both the pressurized liquid and the compressed gas. *See* answer A1.

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', written in a cursive style.

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

From: [INFOCNTR \(PHMSA\)](#)
To: [Baker, Yul \(PHMSA\)](#)
Cc: [Hazmat Interps](#)
Subject: FW: Regulatory Interpretation Request – Flammability Classification of Pressurized Spray Products
Date: Friday, February 20, 2026 16:19:59
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Good afternoon,

Please see the following request for a letter of interpretation. Let us know if you need anything.

Best,

Aminah

From: Sona Pithadia <Sona.Pithadia@bona.com>
Sent: Friday, February 20, 2026 2:57 PM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Cc: Stacey Tucker <Stacey.Tucker@bona.com>; Björn Johansson <Bjorn.Johansson@bona.com>; Morgan Jarrett <Morgan.Jarrett@bona.com>; Amanda Walker <Amanda.Walker@bona.com>; Derek Klinedinst <Derek.Klinedinst@bona.com>; Christi Alston <Christi.Alston@bona.com>; Laura Marshall <Laura.Marshall@bona.com>; Stacey Gustafson <Stacey.Gustafson@bona.com>; Matz Lilja <Matz.Lilja@bona.com>; Susan Stern <Susan.Stern@bona.com>
Subject: Re: Regulatory Interpretation Request – Flammability Classification of Pressurized Spray Products

You don't often get email from sona.pithadia@bona.com. [Learn why this is important](#)

Hello,

Thank you for getting back to me.

Yes - we would like the questions in the email below to be addressed in a written response for our documentation.

You may use the following phone number if needed: (937) 369-6068.

Thank you again,

Sona Pithadia
Regulatory & Sustainability Manager

Bona®

sona.pithadia@bona.com
4275 Corporate Drive
Monroe, NC 28110



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From: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>

Sent: Friday, February 20, 2026 2:52 PM

To: Sona Pithadia <Sona.Pithadia@bona.com>

Subject: RE: Regulatory Interpretation Request – Flammability Classification of Pressurized Spray Products

Caution: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Sona,

We have received your request for a written letter of interpretation regarding the hazardous materials regulations (49 CFR Parts 171-180). The hazardous materials regulations are available at the following URL:

<https://www.phmsa.dot.gov/phmsa-regulations>

However, before we can submit your request for processing, please respond to this email with:

- Telephone Number

Sincerely,

Aminah, Hazardous Materials Specialist

An e-mail response from this office is considered informal guidance. Formal guidance may be requested in accordance with 49 CFR 105.20. <https://www.phmsa.dot.gov/standards-rulemaking/hazmat/hazardous-materials-information-center>

From: Sona Pithadia <Sona.Pithadia@bona.com>

Sent: Friday, February 20, 2026 2:00 PM

To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>

Cc: Amanda Walker <Amanda.Walker@bona.com>; Matz Lilja <Matz.Lilja@bona.com>; Björn Johansson <Bjorn.Johansson@bona.com>; Stacey Tucker <Stacey.Tucker@bona.com>; Morgan Jarrett <Morgan.Jarrett@bona.com>; Susan Stern <Susan.Stern@bona.com>; Stacey Gustafson <Stacey.Gustafson@bona.com>; Laura Marshall <Laura.Marshall@bona.com>; Christi Alston <Christi.Alston@bona.com>; Derek Klinedinst <Derek.Klinedinst@bona.com>

Subject: Regulatory Interpretation Request – Flammability Classification of Pressurized Spray Products

You don't often get email from sona.pithadia@bona.com. [Learn why this is important](#)
Hello,

We are requesting clarification regarding classification of a pressurized spray product under applicable CFR hazardous materials regulations.

We have received differing interpretations internally, from publicly available regulatory guidance, and from suppliers, so we would like confirmation directly from the regulatory authority in writing to ensure our future labeling and shipping classifications etc. align correctly.

Product configuration under evaluation:

- Pressurized container (**aerosol or bag-on-valve system**)
- Propellant **may** be hydrocarbon or non-flammable compressed gas (nitrogen/air/CO₂)
- Liquid formulation **may or may not** contain flammable components

We would appreciate guidance on the following:

1. Does the presence of a pressurized container, or labeling such as “contents under pressure,” automatically classify a product as a flammable aerosol?
2. Is flammability determined by the packaging format itself, or by the finished product formulation and applicable testing criteria (e.g., flash point, ignition/flammability testing)?

3. Can a pressurized spray product using a non-flammable compressed gas propellant be classified as non-flammable depending on the final formulation and test results?

Please let us know if any additional information would help you provide an accurate response.

Anything you can provide us on the above would be greatly appreciated.

Thank you for your assistance.

Best regards,

Sona Pithadia

Regulatory & Sustainability Manager

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Monroe, NC 28110

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