



Larson, R.  
26-0066

## Fwd: FW: Letter of Interpretation Request - Alloy Products Corp

2 messages

**DerKinderen, Dirk** <dirk.derkinderen@dot.gov>

Wed, May 27, 2026 at 8:33 AM

To: "Baker, Yul (PHMSA)" <yul.baker@dot.gov>, "Pollack, Arthur (PHMSA)" <arthur.pollack@dot.gov>

Gentlemen, please enter the request for a letter of interpretation into our system. Thanks.

----- Forwarded message -----

From: **Borie, Safiya** <safiya.borie@dot.gov>

Date: Tue, May 26, 2026 at 12:17 PM

Subject: FW: Letter of Interpretation Request - Alloy Products Corp

To: DerKinderen, Dirk (PHMSA) <dirk.derkinderen@dot.gov>

Cc: Horsley, Adam (PHMSA) <adam.horsley@dot.gov>

Hi Dirk,

I am forwarding the letter of interpretation request (detailed in the email below) from Raymond Woo of Alloy Products, which we discussed earlier.

I have informed Mr. Woo that we will pass on his request to the appropriate office. I also clarified that he should contact the regional office that conducted the inspection about the other probable violations from their warning letter and inspection. He intends to follow up with Central Region.

Please let me know if you need anything else from me.

Thanks,  
Safiya

----- Forwarded message -----

From: **Ray Woo** <rayw@alloyproductscorp.com>

Date: Thu, Apr 9, 2026 at 1:48 PM

Subject: FW: Letter of Warning DRAFT

To: Borie, Safiya <safiya.borie@dot.gov>

Cc: Betsy Bear Hoff <betsyb@alloyproductscorp.com>

Safiya;

Thank you for the letter of interpretation. After reviewing it, I do not believe it addresses our situation directly. The letter asks to either recertify a existing DOT-4BW canister as a UN1A1/A2 drum or to dual certify it as both a DOT-4BW and a UN1A1/A2. We have various issues with what this letter is stating regarding our situation.

- In recertifying it, they are asking to cover up the existing DOT-4BW marking with the new UN1A1 marking. This does not help us because by doing this the higher pressure rating of the DOT-4BW is covered up. Even though a container designed to the DOT-4BW standard can meet the UN1A1/A2 requirements, the higher pressure rating is the point of contention. Our drums would clarify state the higher pressure rating (greater than 40 psi) as being built accordingly to ASME.
- By dual rating this container as both a DOT-4BW and a UN1A1/A2 the higher pressure rating of the container is acknowledged. However, that is tied to the DOT-4BW design and not the UN1A1/A2 specification. This does not

accept the fact that a UN1A1/A2 drum can be rated by itself with a higher than 40 psig pressure rating. We do not intend to dual certify these drums. This is what raised the issue in our audit from over two years ago.

We respectfully ask that a company specific letter is written that acknowledges the fact that we are approved to build a UN1A1/A2 drum with a greater pressure rating than 40 psi. This letter should also address the fact that the issues identified in the audit of our facility of 11/16/2023 and letter of warning received on 2/17/2026 have been resolved satisfactorily (See attached). More specifically, the probable violations mentioned in the last page of the letter of warning under corrective action or additional summary # 1 and 3.

I look forward to receiving this letter so we can both close out this matter.

Regards.

Raymond Woo

Director of Engineering

Alloy Products Corp.

1045 Perkins Ave.

Waukesha, WI 53186

Email: [Rayw@alloyproductscorp.com](mailto:Rayw@alloyproductscorp.com)

(262) 832-8135 office (direct)

(262) 542-6603 (general)

(262) 542-5421 (fax)

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Thanks,



Dirk Der Kinderen

Chief


PHMSA/Office of Hazardous Materials Safety

U.S. Department of Transportation


(202) 365-4684 (cell)

[dirk.derkinderen@dot.gov](mailto:dirk.derkinderen@dot.gov)

**3 attachments**

 **LOI 23-0021.pdf**  
493K

 **Exit Briefing.pdf**  
159K

 **Letter of warning.pdf**  
1561K

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**Baker, Yul** <yul.baker@dot.gov>

Wed, May 27, 2026 at 8:36 AM

To: "DerKinderen, Dirk" <dirk.derkinderen@dot.gov>, "Pollack, Arthur (PHMSA)" <arthur.pollack@dot.gov>

I will log this in FMP and assign it.

[Quoted text hidden]

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Thank you,



Mr. Yul Brenner Baker Jr.  
Transportation Regulations Specialist  
PHMSA/OHMS  
U.S. Department of Transportation  
(717) 688-9977  
[yul.baker@dot.gov](mailto:yul.baker@dot.gov)