



26-0070
Casey

Fwd: Request for interpretation

2 messages

Fri, Jun 5, 2026 at 12:09 PM

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

From: **Bob Richard** <brichard@hazmatsafety.com>

Date: Fri, Jun 5, 2026 at 7:03 AM

Subject: Request for interpretation

To: Nickels, Matthew (PHMSA) <matthew.nickels@dot.gov>

Cc: Ripley, Matt (PHMSA) <matt.ripley@dot.gov>, Supko, Ben (FAA) <ben.supko@faa.gov>, DeJohn, Charlotte J - Jersey City, NJ <cjdejohn@uspis.gov>, Adam HOPKINS <adamhopkins@icloud.com>

Matt,

Please accept the attached request for a letter of interpretation.

Bob Richard

Vice President

Cell: 773-540-0837

Email: brichard@hazmatsafety.com

Web: www.hazmatsafety.com

Pacific Gas & Aerosol
714-345-5463
adam@pga-corp.com
pga-corp.com

June 4, 2026

Mathew Nichols,
Director Standards and Rulemaking Division
Pipeline and Hazardous Materials Safety Administration

Attn: Standards and Rulemaking Division, PHH-10 U.S.
Department of Transportation
1200 New Jersey Avenue, S.E. East Building, Floor 2
Washington, DC 20590-0001

Subject: Request for Interpretation and response to questions regarding compliance and violations of the HMR; Shipment of Green Gas in 2Q receptacles

Dear Mr. Nichols,

I am writing to seek clarification on the shipment of propane (AKA Green Gas) in 2Q receptacles.

I received a gas receptacle via an e-commerce site that contained propane gas. The shipper was Lancer Tactical, 12140 Altamar Place Santa Fe Springs CA 90670. The receptacle had none of the required hazmat markings. It was shipped in a plain brown envelope with no hazmat markings. The packaging was not a strong outer packaging. It only has a 2Q mark and M5755. M5755 is registered to Alucon Public Company Limited:

Alucon Public Company Limited
Head Office:
500 Moo 1, Soi Sirikam, Sukhumvit Road, Samrong Nua Sub-district, Muang Samutprakan District, Samutprakan Province 10270 Thailand

Sriracha Plant:
272/5 Moo3, Pak-ruam Aow-Udom Road, Borwin Sub-district, Sriracha District, Chonburi Province 20230 Thailand

The can says "Made in Taiwan" but Alucon which is the registered manufacturer according to M5755 is based in Thailand.

Doesn't the M number need to be consistent with manufacturing in Thailand not Taiwan? What actions does PHMSA take to ensure M number recipients are compliant especially those manufacturing DOT 2P or 2Q receptacles outside the United States? Considering that the current administration favors products made in America shouldn't there should be more oversight over foreign gas receptacles such as DOT 2P or 2Q receptacles and efforts to promote receptacles made compliantly by American manufacturers in the United States?

The Green Gas receptacle has a marking indicating that it contains propane (C_3H_8) and a lubricant. The volume marked on the receptacle is 600 ml and the pressure marked is 171 PSI. If it truly contains propane as indicated the marked pressure is suspect. A DOT 2Q can must be used for pressures between 161 psig and 180 psig at 130° F (55° C). However, propane has a vapor pressure of approximately 122 psi at 77° F and at 122° F it reaches approximately 268 psi.

The DOT 2Q receptacle has a release device as can be seen in the photo below. Since it expels a gas only it does not meet the definition of an aerosol. It does not appear to be under the authorization of a special permit because there is no SP marking on the receptacle. Since it has a release device it also cannot be shipped as "UN 2037, Gas Cartridges (flammable) without a release device, non-refillable or Gas receptacles small containing gas".

The DOT 2Q receptacle has a release mechanism that when pressed releases gas. Is this considered a release device according to the HMR?



What is the compliant way to ship these gas receptacles including proper packaging, hazard communication and documentation?

Please verify that based on the 600 ml volume these cans cannot be shipped as limited quantity.

The shipment was undeclared and there are thousands of these cans being sold by various shippers on e-commerce platforms. If you simply search the web for "green gas propane or butane for air guns" you will see that these receptacles are shipped in vast quantities on a regular basis with the majority shipped non-compliantly. This poses a risk to the public and transport workers. They are being shipped by parcel carrier and through USPS. Since many are shipped undeclared, there is a potential for them to be shipped by air or in mail bags posing a serious risk to the flying public. This should be a serious concern for PHMSA, FAA and USPS.

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These are photos of the receptacle:



What action is PHMSA taking to address this non-compliance?

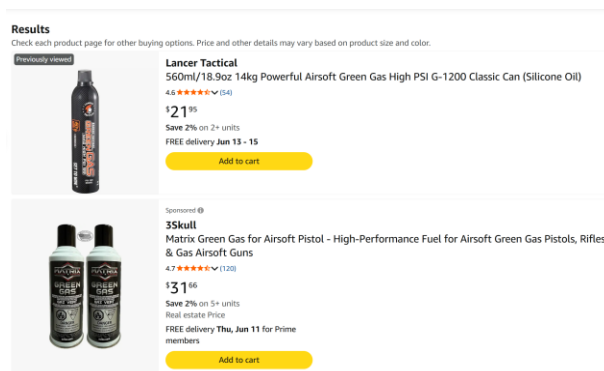
Does DOT and USPS coordinate on enforcement?

Since these receptacles are commonly being shipped undeclared from numerous shippers what actions will be taken to prevent them from being shipped by air or in mailbags carried aboard passenger or cargo aircraft?

What is the penalty for shipping the 2Q receptacles described herein undeclared?

These receptacles are being offered by various shippers using e-commerce platforms. What actions are being taken to hold e-commerce companies that facilitate these shipments accountable?

Here's an example of how readily available these gas receptacles are on e-commerce platforms:





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I look forward to your response.

Sincerely,

Adam Hopkins
Owner/CEO
Pacific Gas & Aerosol
adam@pga-corp.com