



26-0085
Baker

Fwd: Request for Letter of Interpretation

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From: **Daniel Stoehr** <info@danielstraining.com>

Date: Tue, Jun 23, 2026 at 6:10 PM

Subject: Request for Letter of Interpretation

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

Scenario:

- A company wishes to offer a hazardous material for transportation in commerce by motor vehicle within the U.S.
- The hazardous material is a solid powder packed in teflon bags of approximately 500 grams each.
- The company has identified an authorized single packaging for the hazardous material.
- The authorized single packaging is a UN Standard packaging.
- The company wishes to pack as many of the 500 gram teflon bags as possible in the authorized single packaging.
- The company will ensure the packaging's gross mass limit is not exceeded.
- The company will ensure the 500 gram teflon bags are compatible with the lading.
- The company will ensure the 500 gram teflon bags will not adversely affect the level of performance of the authorized single packaging.

Questions for the scenario described above:

1. May the UN Standard packaging be used without additional testing?
2. Would the packaging continue to meet the definition at 49 CFR 171.8 of a single packaging or would it meet the definition of a combination packaging?

Additional information:

- LOI 13-0221 reads in part, "An authorized single packaging for a hazardous material, such as the UN 6HA composite drum, may contain inner receptacles, such as the sealed plastic bag, that are compatible with the lading as long as the inner receptacles would not adversely affect the level of performance of the packaging. The packaging would remain marked as a single packaging."
- LOI 99-0151 reads in part, "An authorized single packaging for a hazardous material may contain inner receptacles that are compatible with the lading as long as the inner receptacles would not adversely affect the level of performance of the packaging. The packaging would remain marked as a single packaging."

Thank you and please advise.

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