

Cajar, J.
26-0121

Fwd: Request for Letter of Interpretation- 49 CFR 172.101(c)(11)

1 message

INFOCNTR (PHMSA) <infocntr.infocntr@dot.gov>

Mon, Sep 14, 2026 at 10:40 AM

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

Cc: Hazmat Interps <hazmatinterps@dot.gov>

Good Morning,

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

Best,

Aminah

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

From: **David Olsen** <dolsen@setenv.com>

Date: Sat, Sep 12, 2026 at 11:10 PM

Subject: Request for Letter of Interpretation- 49 CFR 172.101(c)(11)

To: infocntr@dot.gov <infocntr@dot.gov>**Request for Written Interpretation**

Good morning,

I am requesting an interpretation regarding 49 CFR 172.101(c)(11), which references a material that is considered to be a **hazardous waste**, or a **sample** of a material for which the hazard class is uncertain and must be determined by testing, may be assigned a tentative proper shipping name, hazard class, identification number, and packing group, if applicable, based on the shipper's tentative determination according to:

- (i) Defining criteria in this subchapter;
- (ii) The hazard precedence prescribed in § 173.2a of this subchapter;
- (iii) The shipper's knowledge of the material

For unknown gas cylinders that do not meet the sample size limitations and are being sent for disposal, is it acceptable to ship under the generic proper shipping name *UN1956: Compressed gas, n.o.s., 2.2* as a tentative proper shipping description after each cylinder's CGA connections, type of pressure-relief device, cylinder material of construction, manufacturer color coding system, generator's knowledge etc., has been reviewed and all indicators reflect that it contains an inert gas such as Nitrogen or Helium?

Your written response to this is greatly appreciated. If you require any further information, feel free to contact me at (281) 755-4992.

Thank you for your time,

David Olsen, Jr.

David Olsen, Jr CHMM

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