



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, D.C. 20590

**AUG 30 2012**

Mr. Sandy Clark  
DRMS-VSE  
700 E. Roth Rd., Bldg. S-3  
French Camp, CA 95231

Ref. No. 12-0165

Dear Mr. Clark:

This responds to your August 2, 2012 request for clarification on the classification of aerosols under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if the proper shipping name, "UN 1950, Aerosols, flammable, n.o.s. (engine starting fluid) (each not exceeding 1 L capacity), 2.1" is used only for engine starting fluid or may it be used with any hazardous material aerosol that contains toluene, acetone, or isobutene.

Section 173.22 states that it is the shipper's responsibility to properly classify a hazardous material. This office does not perform that function. However, upon review of the information you supplied, it is the opinion of this office, that the most appropriate proper shipping description for aerosols used as engine starting fluid is "UN 1950, Aerosols, flammable, n.o.s. (engine starting fluid), (each not exceeding 1 L capacity), 2.1." There are five different entries in the Hazardous Materials Table (HMT; § 172.101) for UN 1950. Therefore, the most appropriate proper shipping description for aerosols containing toluene, acetone, or isobutene not used as engine starting fluid is "UN 1950, Aerosols, flammable (each not exceeding 1 L capacity), 2.1."

I hope this answers your inquiry. If you need additional assistance, contact this office at (202) 366-8553.

Sincerely,

Robert Benedict  
Chief, Standards Development Branch  
Standards and Rulemaking Division

Boothe  
3172.101  
Shipping Name  
12-0165

**Drakeford, Carolyn (PHMSA)**

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**From:** INFOCNTR (PHMSA)  
**Sent:** Friday, August 03, 2012 3:31 PM  
**To:** Drakeford, Carolyn (PHMSA)  
**Subject:** FW: PSN question  
**Attachments:** How to UNZIP.html; SecureZIP Attachments.zip

Hi Carolyn,

This caller requested his letter be submitted as a formal letter of interpretation.

Thanks,  
Victoria

-----Original Message-----

**From:** Clark, Sandy DLA CIV DISPOSITION SERVICES [<mailto:Sandy.Clark@dla.mil>]  
**Sent:** Thursday, August 02, 2012 1:50 PM  
**To:** INFOCNTR (PHMSA)  
**Subject:** PSN question

Completed by AE via phone on 8/3/12 at 2:15 left vm

Alcon,

The title 49 has a proper shipping name in the HMT of "Aerosols, flammable, n.o.s. (engine starting fluid) (each not exceeding 1 L capacity), 2.1, UN1950.

Question, is this shipping name only to be used with "engine starting fluid"?  
Or can it be used with any H//M aerosol i.e. that contains items like "toluene, acetone or isobutane" as its hazardous technical name?

Thanks in advance,

Mr. S. L. CLARK, JR.  
E.P.S., C.O.R., E.M.R., T.A.S.O.  
WK# (209) 982-2147 DSN 462  
FAX# (209) 982-2095 DSN 462

Reputation is what men and women think of us; character is what GOD and Angels know of us...