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**From:** Henderson, Dustin <Dustin.Henderson@dps.texas.gov>  
**Sent:** Monday, June 23, 2025 8:47 PM  
**To:** INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>  
**Subject:** Letter of Interpretation Request

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May I get a formal letter of interpretation on the following:

A frac tank is a *large piece of mobile equipment used to store bulk liquids*. These tanks get their name from their popularity in the oil & gas industry. They commonly store fluids and diesel fuel on site during oilfield operations. They range in capacity from 8,400 to 210,000 gallons, therefore meeting the bulk package definition. They are typically manufactured with a single or tandem axle and are not designed to transport liquids. Since they are not “intended primarily for the carriage of liquids or gases,” they do not meet the definition of a cargo tank. Still, they are often transported with diesel or diesel residue. I've attached two photos for reference.

1. Does a frac tank meet the definition of portable tank in 171.8?
2. If it meets the portable tank definition, is NA1993, Diesel Fuel, 3, PGIII authorized for transport in a frac tank under 173.241(c)?
3. Can NA1993, Diesel Fuel, 3, PGIII be transported in a frac tank as residue?
4. Can NA1993, Diesel Fuel, 3, PGIII be transported in a frac tank, while the frac tank is located on a trailer?
5. Would the frac tank qualify as a tank and therefore the driver be required a tank endorsement?







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