

**From:** [John Mitton](#)  
**To:** [INFOCNTR \(PHMSA\)](#)  
**Cc:** [Baker, Yul \(PHMSA\)](#); [Jim Crouse](#)  
**Subject:** Letter of Interpretation request - 49 CFR 171.8 and 393.68  
**Date:** Tuesday, June 24, 2025 13:55:57

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*Good afternoon,*

*We wish to express our appreciation to the Department of Transportation for providing a means for the public to clarify and more accurately conform with the Hazardous Materials Regulations. Please see below our formal request for Letter of Interpretation with respect to 49 CFR 171.8 and 49 CFR 393.68.*

*Thank you in advance for your consideration and response.*

*///*

Mr. Shane Kelley  
Director, Standards and Rulemaking Division  
U.S. DOT/PHMSA (PHH-10)  
1200 New Jersey Avenue, SE East Building, 2nd Floor  
Washington, DC 20590

Re: Use of CNG fuel and applicable fuel tank standard under 49 CFR 171.8 and 49 CFR 393.68

Dear Mr. Kelley,

Please confirm that in accordance with 49 CFR 171.8, trailer-mounted compressed natural gas (CNG) fuel tanks are not subject to the Hazardous Materials Regulations (HMR) when used solely for the purpose of supplying fuel for the operation of a power generator which is mounted to the same trailer, so long as the fuel system is mounted in accordance with 49 CFR 393.65.

In searching prior Letters of Interpretation we have found examples of trailer-mounted fuel tanks not being subject to the HMR as pertaining to diesel fuels (for example #13-0120) and propane fuels (for examples #11-0181 and #21-0032R), but could not find any Letters of Interpretation associated with CNG fuel as envisioned in 49 CFR 393.68.

We also seek confirmation that in accordance with 49 CFR 393.68, fuel tanks meeting

FMVSS No. 304 provide the applicable standard for this trailer-mounted power generator application.

Thank you,

John Mitton, Consultant

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