
From: James Owen <JOwen@matson.com>
Sent: Monday, July 14, 2025 2:38 PM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Subject: RE: Request for Letter of Interp

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

My apologies. The response can be mailed to 3426 E. Libby St, Phoenix AZ 85032.

NOTE: Approval of Shipping Papers is always subject to the Port/Vessel's ability to accommodate the dangerous goods with other commodities, stowage restrictions and permit requirements.

For assistance from the DG Team after 8PM PST please call a member of the team directly.



James Owen | Manager Dangerous Goods | SQES I MBA
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From: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Sent: Monday, July 14, 2025 11:29 AM
To: James Owen <JOwen@matson.com>
Subject: RE: Request for Letter of Interp

**** SECURITY ADVISORY! This email originated externally. Verify sender is authentic

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Dear James,

We have received your request for a written letter of interpretation regarding the hazardous materials regulations (49 CFR Parts 171-180). The hazardous materials regulations are available at the following URL:

<https://www.phmsa.dot.gov/phmsa-regulations>

However, before we can submit your request for processing, please respond to this email with:

- Physical Mailing Address

Sincerely,

Aminah, Hazardous Materials Specialist

An e-mail response from this office is considered informal guidance. Formal guidance may be requested in accordance with 49 CFR

105.20. <https://www.phmsa.dot.gov/standards-rulemaking/hazmat/hazardous-materials-information-center>

From: James Owen <JOwen@matson.com>

Sent: Friday, July 11, 2025 7:30 PM

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

Subject: Request for Letter of Interp

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

To whom it may concern,

I have questions regarding both the shipment of empty (uncleaned) propane tanks as well as vehicles placed inside of a freight container.

My first question is in reference to a households good shipment moving via ocean that contains empty propane tanks. 173.29(b)(1) states: Any hazardous material shipping name and identification number markings, any hazard warning labels or placards, and any other markings indicating that the material is hazardous (e.g., RQ, INHALATION HAZARD) are removed, obliterated, or securely covered in transportation. This provision does not apply to transportation in a transport vehicle or a freight container if the packaging is not visible in transportation and the packaging is loaded by the shipper and unloaded by the shipper or consignee.

In the case of a HHGDS shipment the shipper and consignee are the same person, and they would both load and unload the freight container. Does this statement indicate that if the shipper loads an empty but not purged and cleaned propane tank into their container and it is not unloaded until it arrives at the destination, then it is not subject to the provision as noted in 173.29(b)?

It is difficult for HHGDS shippers to obtain a purge statement for a propane tank and I have rarely, if ever seen one from a HHGDS shipper. If the notation above does not exempt the shipper from the regulations, how are they to prove to the carrier that the tanks have been sufficiently cleaned and purged?

The next question is specific to Maston Navigation. A vehicle can ship in a freight container provided that it meets the regulatory requirements. 176.905(i) states *Exceptions*. A vehicle is not subject to the requirements of this subchapter if any of the following are met: (1); **The vehicle is stowed in a hold or compartment designated by the administration of the country in which the vessel is registered as specially designed and approved for vehicles and there are no signs of leakage from the battery, engine, fuel cell, compressed gas cylinder or accumulator, or fuel tank, as appropriate.** For vehicles with batteries connected and fuel tanks containing gasoline transported by U.S. vessels, see [46 CFR 70.10-1](#) and [90.10-38](#);

Matson carries DOT Special Permits 12592 and 11866. I am asking for clarification in writing if these SP's are sufficient to meet the above exemption and thus no shipping papers are required, or if for flammable liquid powered vehicles, 176.905(i)(3) must ALSO be met. The vehicle is powered by a flammable liquid fuel that has a flashpoint less than 38 °C (100 °F), the fuel tank is empty, and installed batteries are protected from short circuit. Vehicles are considered to be empty of flammable liquid fuel when the fuel tank has been drained and the vehicles cannot be operated due to a lack of fuel. Engine components such as fuel lines, fuel filters and injectors do not need to be cleaned, drained or purged to be considered empty. The fuel tank does not need to be cleaned or purged.

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