

**From:** [INFOCNTR \(PHMSA\)](#)  
**To:** [Baker, Yul \(PHMSA\)](#)  
**Subject:** FW: Interpretations of 180.407(a)(6)(ii)  
**Date:** Monday, August 18, 2025 14:17:32  
**Attachments:** [hbroundlogosmall6-21-2024\\_c347c931-b51e-40cd-b46d-c458ac45628e.png](#)  
[hbwrittenlogosmall6-21-2024\\_0867b754-5609-42d5-9bcf-5c3a727e6d66.png](#)  
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Hi Yul,

Please see the below interpretation request.

Let us know if you need anything,

-Breanna

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**From:** Will Hunter <[whunter@hillbrothers.com](mailto:whunter@hillbrothers.com)>  
**Sent:** Friday, August 15, 2025 5:42 PM  
**To:** INFOCNTR (PHMSA) <[INFOCNTR.INFOCNTR@dot.gov](mailto:INFOCNTR.INFOCNTR@dot.gov)>  
**Subject:** Interpretations of 180.407(a)(6)(ii)

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I am looking for an interpretation of the HMR 180.407 (a)(6)(ii).

We want to deregulate one of our CTMV and use it for non-hazardous materials only. We need to know what the interpretation of "covered in a secure manner" means.

- We do not want to remove the specification plate as it has manufacturing information on it.
- We do not want to obliterate the specification plat for the same reason mentioned above
- Leaving us with the "cover in a secure manner" option

We know that we have to address the DOT MC-XXX Number in order to deregulate it, and generally that is done by striking out the number so it is no longer legible, but we need to know what "cover in a secure manner" means.

*With appreciation,*



**Will Hunter**  
Compliance Officer, Hazardous Materials

**HILL BROTHERS** *Chemical Co.*

**Cell:** (602) 695-4825 **Office:** (623) 535-9955  
**Email:** [whunter@hillbrothers.com](mailto:whunter@hillbrothers.com) **Website:** [www.hillbrothers.com](http://www.hillbrothers.com)

21639 N. 12<sup>th</sup> Ave, STE. 100  
Phoenix, AZ 85027

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