

25-0116
Pollack

From: Trevor Weatherbee <trevor.weatherbee@impact-nano.com>

Sent: Thursday, August 21, 2025 9:24 AM

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

Subject: Request for Clarification - 49 CFR 173.335(b)

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Greetings

My name is Trevor Weatherbee of Impact Nano, LLC. We are looking for clarification on filling limits for chemicals under pressure for transportation by highway in UN Pressure Receptacles.

Specifically, we would like to understand if the "water capacity" referenced in 49 CFR 173.335(b) is meant to be the "water capacity (nominal)" or if it is the "Brim Full Volume." To expand upon this, we have UN7A2 containers with a nominal capacity of 240 liters and a brim full volume of 268.75 liters. The material we wish to transport has a calculated filling ratio of 0.838 kg per liter of container volume. However it seems ambiguous in 49 CFR 173.335(b) whether the liter of container volume is based upon the water capacity (nominal) or water capacity (brim full). The difference being a maximum fill of 201.12 kg (nominal) or 225.21 kg (brim full).

Your guidance on this matter would be very much appreciated.

Best regards,

-Trevor

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