

From: [INFOCNTR \(PHMSA\)](#)
To: [Baker, Yul \(PHMSA\)](#)
Cc: [Hazmat Interps](#)
Subject: Letter of Interpretation Request - FW: Request for Formal Interpretation - Use of DOT-4L Cylinders under 49 CFR 173.202
Date: Friday, November 14, 2025 13:58:02

Good afternoon,

Please see the following interpretation request. Let us know if you need anything else.

Best,
Janaye

From: Ames Ettinger <Ames.Ettinger@tchem.com>
Sent: Friday, November 14, 2025 11:00 AM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Cc: John Riley <John.Riley@tchem.com>
Subject: Request for Formal Interpretation - Use of DOT-4L Cylinders under 49 CFR 173.202

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Dear PHMSA Standards and Rulemaking Division,

I am requesting a formal letter of interpretation regarding the use of DOT-4L cylinders for transportation of sulfurous acid, 5% solution (UN 1833) under 49 CFR 173.202 - Non-bulk packaging requirements for liquid hazardous materials in Packing Group II.

Specifically, 49 CFR 173.202(c) authorizes "cylinders, specification, as prescribed for any compressed gas, except for Specifications 8 and 3HT," without explicitly prohibiting the DOT-4L specification. DOT-4L cylinders, however, are designed for cryogenic refrigerated liquefied gases under 49 CFR 178.57.

We request PHMSA's interpretation on the following point:

1. Is a DOT-4L cylinder considered an authorized cylinder specification under 49 CFR 173.202 for the transportation of sulfurous acid (UN 1833), or would this constitute a non-standard use requiring a PHMSA special permit?
2. If DOT-4L cylinders are considered authorized under 173.202, would they continue to be exempt from requalification under 49 CFR 180.209, as currently specified for DOT-4L cylinders?

Thank you for your clarification.

Please advise if any additional information is needed.

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