

10/27/25

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

Subject: Request for Letter of Interpretation – Classification of 120-Gallon ASME
Propane Container Under 49 CFR §171.8

Dear Mr. Kelley:

I am requesting a formal Letter of Interpretation regarding the classification of a 120-gallon ASME propane container when transported in commerce for stationary installation at a customer site. Specifically, I seek clarification on whether such a container should be considered a bulk package or non-bulk package under 49 CFR §171.8.

I have reviewed PHMSA Letter of Interpretation 19-0045, which provides guidance on determining bulk versus non-bulk packaging by referencing the 454 kg (~1,001 lb.) threshold based on water capacity. My calculations are as follows:

$$120 \text{ gallons} \times 8.34 \text{ lb/gallon (water weight)} = 1,000.8 \text{ lb} / 454.1 \text{ kg}$$

Assuming I am using the same number for the weight of water calculation that the Hazardous Material Regulations uses, and because this total is just above 454 kg, the classification appears to sit precisely on the regulatory threshold. The interpretation of this borderline case is unclear to me. While the container appears to qualify as non-bulk by the pound conversion (under 1,001 lbs.), it technically exceeds the kilogram limit by 0.1 kg, and I understand that when metric units appear, they are the regulatory standard.

I would appreciate PHMSA's clarification on how this should be interpreted in practice—specifically, whether such a 120-gallon ASME propane container should be treated as a bulk or non-bulk package for the purposes of the Hazardous Materials Regulations.

Thank you for your time and assistance. Please feel free to contact me if additional information is needed.

Respectfully,

A handwritten signature in blue ink, appearing to read "Greg Miller".

Greg Miller
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