

From: [INFOCNTR \(PHMSA\)](#)
To: [Hazmat Interps](#)
Subject: FW: HCR188CR441A for MVAC units on public highways
Date: Tuesday, January 6, 2026 16:10:18
Attachments: [R-441A MVAC Completeness Letter June 3 2016.pdf](#)
[valeo auto.pdf](#)
[DOT 39 cylinder DOT letter.pdf](#)
[DOT letter clarification 2.pdf](#)
[ETL certification letter.pdf](#)
[R441A venting.pdf](#)

Hello Hazmat Interps,

See attached and below request for letter of interpretation.

Thanks,
Jonathon

From: richardastrust.com <richardastrust@yahoo.com>
Sent: Tuesday, January 6, 2026 12:52 PM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Cc: Joerg Blachutzik <joerg.blachutzik@gmx.de>; Andy Tujios <tujios@aol.com>
Subject: HCR188CR441A for MVAC units on public highways

You don't often get email from richardastrust@yahoo.com. [Learn why this is important](#)

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To whom it may concern

For many years, A S Trust & Holdings and Richard H Maruya, developer of R441A, had an application with the U S EPA Stratosphere O Zone Division. R441A is a pure hydrocarbon blend ozone-friendly, PFAS-free, and legal for release into the atmosphere. The EPA finally granted R441A a completed application but placed a restriction that no A 3 flammable refrigerant is allowed on U S Public Highways, yet they allow the 1234YF, an A2L refrigerant who has a larger refrigerant charge amount and cannot be released to the atmosphere on U S Public highways. 1234YF is a non-PFAS free refrigerant and if leaked to the atmosphere is not harmful to human health and the environment. R441A is safety listed with Intertek and any MVAC system can be certified by Intertek as safe to use with the R441A refrigerant in a MVAC system.

The EPA ruled that R441A, being a A3 flammable refrigerant, cannot be stored transported in a small-sized can. This was stressed to me at several meetings with them.

My question: does the U S EPA rule the DOT on U S Public highways and dictate the rules which DOT must follow or does the DOT makes its own rules? A completed application on R441A MVAC refrigerant is done but the EPA refuses to allow it on the U S Federal Register because of their "no A3 flammable refrigerant allow on U S Public highways rule". In the

attached letter, R441A uses less refrigerant the current 1234YF (around 40% of the normal charge amount). Also attached is the 134A vs HCR188C R441A MVAC charge determination test, both R441A and 1234YF are flammable refrigerants but R441A uses less charge amount then the 1234YF and the 1234YF mvac system is designed for a flammable refrigerant so it indicates the system can use the R441A as a drop-in replacement refrigerant.

I would appreciate a letter on this question, so I have a refence in clarification on who the DOT answers to.

I await your response thank you Richard

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