



Horne, T.
26-0028

Fwd: Request for USDOT/PHMSA determination on acceptance of MIL D 23119G for collapsible aviation fuel bladders

2 messages

INFOCNTR, smb <infocntr.infocntr@dot.gov>

Mon, Mar 2, 2026 at 4:53 PM

To: "Baker, Yul (PHMSA)" <yul.baker@dot.gov>, Hazmat Interps <hazmatinterps@dot.gov>

Good afternoon,

Please see the below interpretation request.

Let us know if you need anything,

Janaye

----- Forwarded message -----

From: **PHMSA Pipelinesafety, smb** <phmsa.pipelinesafety@dot.gov>

Date: Mon, Mar 2, 2026 at 2:10 PM

Subject: Fwd: Request for USDOT/PHMSA determination on acceptance of MIL D 23119G for collapsible aviation fuel bladders

To: PHMSA HM InfoCenter <PHMSAHMInfoCenter@dot.gov>

Good afternoon,

Please find the inquiry below.

Thank you!

Jessica

----- Forwarded message -----

From: **Brown, Joe M** <joe_brown@ios.doi.gov>

Date: Mon, Mar 2, 2026 at 1:34 PM

Subject: Request for USDOT/PHMSA determination on acceptance of MIL D 23119G for collapsible aviation fuel bladders

To: phmsa.pipelinesafety@dot.gov <phmsa.pipelinesafety@dot.gov>

Cc: Babcock, Adam C <adam_babcock@nps.gov>

Dear USDOT/PHMSA Team,

I'm writing on behalf of the U.S. Department of the Interior, Office of Aviation Services (OAS). Our programs occasionally use collapsible fuel containers ("air cargo tanks" / fuel bladders) for AvGas (100LL) in aviation operations and, at times, for ground movement between staging sites. We are seeking a formal determination regarding whether the military specification MIL-D-23119G can be recognized as acceptable (or performance-equivalent) for use under the Hazardous Materials Regulations (HMR), and whether such recognition would satisfy state enforcement by DOTs for ground transport on public roads.

We operate under *NWCG PMS 513 – Standards for Aviation Transport of Hazardous Materials* and the companion authorization *DOT-SP 9198* for agency-directed aviation transport. We want to ensure our containers, markings, and documentation align with PHMSA expectations when UN/UL performance-oriented packaging marks are not present. (References: PMS 513 and DOT-SP 9198)

Our request:

- 1) **Recognition/Equivalency:** Does PHMSA recognize MIL-D-23119G as equivalent to the relevant UN performance-oriented packaging standards (49 CFR Part 178) for collapsible drums/bladders containing flammable liquid fuel (e.g., AvGas 100LL)? If not, are there existing determinations or precedents we can reference?

- 2) **Pathways to Authorization:** If blanket recognition isn't available, what is the appropriate path to authorization for products tested/certified to MIL-D-23119G—e.g., Special Permit or Approval? Please advise the correct division, forms, and typical data requirements (test reports, QA certifications, manufacturing controls).

- 3) **Marking/Documentation:** For operations conducted under DOT-SP 9198 and NWCG PMS 513, what markings, documentation, or handling instructions does PHMSA require when UN/UL marks are absent on the container? (We can provide QA certificates indicating MIL-D-23119G conformance and ISO 9001 quality management compliance.)

- 4) **State Acceptance:** Would any USDOT/PHMSA recognition or authorization of MIL-D-23119G be considered sufficient for enforcement of HMR for ground movements on public roads, or would states require a separate acceptance/authorization?

- 5) **Use Case Specifics:** If helpful for classification and packaging guidance, we can provide product configurations (e.g., non-vented designs with valve caps) and sizes (e.g., ~5.3 gal and ~100 gal). Please let us know whether size/configuration affects eligibility, marking, or documentation.

We would appreciate a written determination or advisory that we can attach to our internal guidance and procurement files.

Thank you very much for your assistance. We look forward to your guidance.

Sincerely,

Joe Brown

Joe M. Brown

National Avionics & Fuels Specialist

U.S. Department of the Interior

Office of Aviation Services

Technical Services Branch

300 E. Mallard Dr., Suite 200

Boise Idaho 83706

(C) 208-501-3417

Nickels, Matthew <matthew.nickels@dot.gov>

Mon, Mar 2, 2026 at 5:45 PM

To: "Pollack, Arthur (PHMSA)" <arthur.pollack@dot.gov>, Hazmat Interps <hazmatinterps@dot.gov>, "Baker, Yul (PHMSA)" <yul.baker@dot.gov>

Cc: "DerKinderen, Dirk (PHMSA)" <dirk.derkinderen@dot.gov>, "Wolcott, Alexander (PHMSA)" <alexander.wolcott@dot.gov>, "Andrews, Steven (PHMSA)" <steven.andrews@dot.gov>

Hey Arthur and Yul, when you assign this, PLEASE make sure the requestor sees its DOI asking for a response, and to ensure it moves quickly.

It might be useful to set up a call with the requestor immediately too, as I'm not sure if they are 'in commenrce' or not... assuming they are using contractors of some sort to move hazmat, plus it appears they are operating under a Special Permit too?

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