



U.S. Department  
of Transportation  
**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, DC 20590

March 17, 2026

Guillermo Garcia Andreu  
Industrial, Technical and Production Director  
Carbotainer S.L.  
C/Buenos Aires, N°4 Pol. Ind. Centrovía  
50196 LA MUELA (Zaragoza) Spain

Reference No. 26-0004

Dear Mr. Garcia Andreu:

This letter is in response to your December 16, 2025 email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the use of United Nations (UN) pressure receptacles (*i.e.*, refillable composite cylinders) meeting International Organization for Standardization (ISO) 11119-2 specification standards, approved under the Transport Canada Transportation of Dangerous Goods (TDG) Regulations and marked with “CAN” to indicate Canada as the country of approval.

We have paraphrased and answered your questions as follows:

- Q1. May these refillable composite cylinders, approved and marked as described above, be used to transport hazardous materials within the United States by highway, rail, air, and vessel?
- A1. Yes. Section 171.12(a)(4) provides that when the HMR require that a Department of Transportation (DOT) specification or a UN pressure receptacle must be used for a hazardous material, a packaging authorized by the Transport Canada TDG Regulations may also be used if it corresponds to the DOT specification or UN standard authorized by the HMR. By incorporating ISO 11119-2:2012/Amd.1:2014(E) into § 171.7 of the HMR, PHMSA authorizes composite cylinders designed to meet this standard.
- Q2. May ISO 11119-2 refillable composite cylinders approved by Transport Canada be offered for sale and placed into commerce in the United States?
- A2. Yes. See answer A1.

- Q3. May ISO 11119-2 refillable composite cylinders, including cylinders conforming to valve protection standards in ISO 11117, be filled within the United States in accordance with the HMR instead of Transport Canada TDG Regulations?
- A3. Yes. Canadian approved UN specification cylinders may be filled within the United States in accordance with the requirements of the HMR instead of Transport Canada TDR regulations. Note that valves are subject to the protection requirements in § 173.301b(c).
- Q4. May an organization that has a Requalification Identification Number (RIN) issued by the United States DOT requalify these cylinders?
- A4. Yes, provided that the scope of the requalification facility RIN approval includes performing requalification of Transport Canada-approved ISO 11119-2 pressure receptacles. UN cylinders with a country of approval of the United States or Canada must be tested in accordance with the test requirements in § 180.207, which specifies requirements for the requalification of UN pressure receptacles.

I hope this information is helpful. Please contact us if we can be of further assistance.

Sincerely,



Dirk Der Kinderen  
Chief, Standards Development Branch  
Standards and Rulemaking Division

**From:** [INFOCNTR \(PHMSA\)](#)  
**To:** [Baker, Yul \(PHMSA\)](#)  
**Cc:** [Hazmat Interps](#)  
**Subject:** FW: Request for Interpretation- Use in U.S. Commerce of UN ISO 11119-2 stamped "TC CAN"  
**Date:** Monday, January 12, 2026 15:31:45  
**Attachments:** [LOI-US DOT-PHMSA Carbotainer\\_r3\\_202512116 Firmada.pdf](#)

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Hi Yul,

Please see the attached interpretation request.

Let me know if you need anything.

Janaye

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**From:** pnoguera@carbotainer.es <pnoguera@carbotainer.es>  
**Sent:** Monday, January 12, 2026 1:10 PM  
**To:** INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>  
**Subject:** Request for Interpretation- Use in U.S. Commerce of UN ISO 11119-2 stamped "TC CAN"

No suele recibir correo electrónico de [pnoguera@carbotainer.es](mailto:pnoguera@carbotainer.es). [Por qué es esto importante](#)

**CAUTION:** This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Mr. Kelley,

My name is Pedro Noguera, and I am writing on behalf of Carbotainer S.L., Spain, where I serve as Quality Manager.

Please find attached a signed Request for Interpretation submitted to PHMSA for your review. The letter requests regulatory clarification regarding the use in U.S. commerce of certain UN pressure receptacles manufactured by Carbotainer and certified under international and Transport Canada frameworks.

This request is intended to confirm the applicable regulatory basis and conditions under the U.S. Hazardous Materials Regulations.

I would kindly appreciate confirmation of receipt of this email.

We would appreciate the consideration of the Standards and Rulemaking Division and remain available should any additional information be required.

Yours sincerely,

Pedro Noguera

**Pedro Noguera** / Responsable Calidad / Dpto. Calidad

+34 669037453

Ext. - 295

[pnoquera@carbotainer.es](mailto:pnoquera@carbotainer.es)

C/Buenos Aires, Nº4 Pol. Ind. Centrovía

50196 LA MUELA (Zaragoza) España

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**Request for Interpretation U.S. DOT / PHMSA.****DATE:** December 16, 2025**TO:** 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 Interpretation- Use in U.S. Commerce of UN ISO 11119-2 stamped "TC CAN" as per Transport Canada Registration per Standard CSA B341 may be used in U.S.**INTRODUCTION**

Carbotainer, manufacturer of UN pressure receptacles certified under the UN ISO 11119-2 standard and holding a type approval registered by Transport Canada (TC) under Registration No. 39-2-0017, respectfully requests confirmation from PHMSA regarding the applicability and recognition of such cylinders for use within the United States.

This inquiry is presented to clarify the acceptance and conditions of use of these pressure receptacles when introduced into U.S. commerce, transported by carriers, filled or requalified domestically, or offered for sale within the United States.

**QUESTIONS PRESENTED****Q1- Shipment / Offer in Commerce.**

Question 1: May ISO 11119-2 UN pressure receptacles meeting the requirements of the Transport Canada TDG Regulations and marked with a country of approval "CAN" to be used to transport hazardous materials within the United States by highway, rail, air, and vessel?

Answer 1: Yes, within the requirements of 49CFR 171.12(a)

**Q2- Sale.**

Question 1: May UN ISO 11119-2 composite cylinders manufactured and certified under the Transport Canada TDG Regulations and marked with a country of approval "CAN" be offered for sale and placed into U.S. commerce?

Answer 2: Yes, provided they meet all applicable technical requirements, and any representation or sale must accurately reflect such compliance in accordance with 49 CFR 171.2(f), 171.2(g) and 171.2(h).

**Request for Interpretation U.S. DOT / PHMSA.**

### **Q3 -Filling / Refilling in the U.S.**

Question 3: May ISO 11119-2 UN pressure receptacles meeting the requirements of the Transport Canada TDG Regulations and marked with a country of approval "CAN" including valve protection per ISO 11117 be filled within the United States per 49CFR Part 173 requirements in-lieu of Transport Canada TDG Regulations?

Answer 3: Yes.

### **Q4 - Requalification in the U.S**

Question 4: May an organization that has a Requalification Identification Number (RIN) issued by US DOT requalify ISO 11119-2 UN pressure receptacles meeting the requirements of the Transport Canada TDG Regulations and marked with a country of approval "CAN"?

Answer: 4: Yes, provided the organization has within their US DOT RIN approval scope to requalify "CAN" approved ISO 11119-2 UN pressure receptacles to the requirements of Transport Canada TDG Regulations.

We respectfully request PHMSA's written interpretation to the specific questions stated above.

Please contact me if any clarification is needed.

**Sincerely,**

**Guillermo Garcia Andreu  
Industrial, Technical and Production Director  
Carbotainer S.L.**