



Casey, C.
26-0062

Fwd: Request for Regulatory Interpretation - Portable Tank Quantity Limits and Heel Restrictions

1 message

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

Wed, May 13, 2026 at 3:15 PM

Good afternoon,

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

Best,

Aminah

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

From: **Blayze Schrepfer** <bschrepfer@fortrexsolutions.com>

Date: Wed, May 13, 2026 at 3:08 PM

Subject: Re: Request for Regulatory Interpretation - Portable Tank Quantity Limits and Heel Restrictions

To: INFOCNTR (PHMSA) <infocntr.infocntr@dot.gov>

Hi, Aminah.

My physical address is:

1501 E 8th St
North Little Rock, AR 72114

Thanks,

Blayze Schrepfer
EHS Manager

501-518-4292

WWW.FORTREXSOLUTIONS.COM



From: INFOCNTR (PHMSA) <infocntr.infocntr@dot.gov>

Sent: Wednesday, May 13, 2026 3:00 PM

To: Blayze Schrepfer <bschrepfer@fortrexsolutions.com>

Subject: Re: Request for Regulatory Interpretation - Portable Tank Quantity Limits and Heel Restrictions

NOTE: It looks like you haven't received an email from this address before: infocntr.infocntr@dot.gov. Please make sure this is a legitimate message.

Dear Blayze,

We have received your request for a written letter of interpretation regarding the hazardous materials regulations (49 CFR Parts 171-180). The hazardous materials regulations are available at the following URL:

<https://www.phmsa.dot.gov/phmsa-regulations>

However, before we can submit your request for processing, please respond to this email with:

- Physical Mailing Address

Sincerely,

Aminah, Hazardous Materials Specialist

An e-mail response from this office is considered informal guidance. Formal guidance may be requested in accordance with 49 CFR 105.20. <https://www.phmsa.dot.gov/standards-rulemaking/hazmat/hazardous-materials-information-center>

On Wed, May 13, 2026 at 2:08 PM Blayze Schrepfer <bschrepfer@fortrexsolutions.com> wrote:

Dear PHMSA Hazmat Information Center,

I am writing to request clarification on two regulatory questions regarding the transportation of hazardous materials in UN portable tanks (ISO tank containers/Isotainers). We have reviewed the applicable sections of 49 CFR but require official interpretation to ensure compliance.

QUESTION 1: Organic Peroxide Quantity Limit

Is there a 40,000 pound (18,000 kg) maximum quantity limit for transporting UN-3119 (Organic Peroxide Type F, Liquid, Temperature Controlled - specifically peroxyacetic acid formulations) in UN portable tanks/ISO tank containers under 49 CFR 173.225?

We have reviewed 49 CFR 173.225 and the Organic Peroxide Portable Tank Table (Table 4 to paragraph (g)) but cannot locate a specific 40,000 pound or 4,250 gallon limit for UN-3119. If such a limit exists, please cite the specific regulation section and paragraph.

The product in question is an antimicrobial agent containing 21-26% peroxyacetic acid, 40-55% acetic acid, and 5-10% hydrogen peroxide, classified as UN-3119.

QUESTION 2: Sodium Hydroxide Heel Volume Restrictions

Are there any DOT regulations that restrict the heel (residual product) volume to 925 gallons or any other specific amount for Sodium Hydroxide solution (32-50% concentration, UN1824, Class 8) in tank trailers or ISO tank containers?

We are aware of 49 CFR 173.29 (Empty packagings) which addresses when tanks containing residue must be transported as hazardous materials. However, we are seeking clarification on whether any volume-

specific restrictions exist for heels of corrosive materials in bulk containers, or if the only requirement is compliance with 49 CFR 173.29 regardless of heel volume.

REQUEST FOR WRITTEN RESPONSE

We respectfully request a written interpretation that we can reference for compliance purposes. If these questions have been previously addressed in published interpretations, please direct us to the relevant interpretation numbers.

Thank you for your assistance. Please let me know if you require any additional information to process this request.

Best regards,

Blayze Schrepfer

EHS Manager

501-518-4292

WWW.FORTREXSOLUTIONS.COM

