

June 17, 2026

Mr. Shane Kelley
Director, Standards and Rulemaking Division
U.S. DOT/PHMSA (PHH-10)
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Request for Interpretation

Subject: Request for Interpretation Regarding DOT 406 Specification Marking of SCT 306 Cargo Tanks

Dear Mr. Kelley,

Pursuant to 49 CFR Part 105, we respectfully request a written interpretation concerning the applicability of the cargo tank specification and marking requirements in 49 CFR Parts 178 and 180 to a cargo tank originally manufactured and certified as an SCT 306 cargo tank under Mexican regulations.

Background

We are evaluating the regulatory status of a cargo tank manufactured to the SCT 306 specification for operation in cross-border hazardous materials transportation between Mexico and the United States. The cargo tank is designed and constructed to meet all technical requirements applicable to a DOT 406 cargo tank, including but not limited to:

- Design pressure requirements;
- Material specifications;
- Shell and head thickness requirements;
- Reinforcement requirements;
- Pressure and leakage testing requirements;
- Emergency relief venting requirements;
- Bottom outlet requirements;
- Accident damage protection requirements;
- Inspection and testing requirements; and
- Other applicable requirements of 49 CFR §§178.345 and 178.346.

The cargo tank would be supported by engineering documentation, calculations, inspection records, and test reports demonstrating compliance with all applicable DOT 406 requirements.

Questions

1. If an SCT 306 cargo tank can be demonstrated through engineering analysis, inspection records, and testing documentation to fully comply with all requirements applicable to a DOT 406 cargo tank under 49 CFR Parts 178 and 180, may the cargo tank be certified and marked as a DOT 406 cargo tank?
2. Does PHMSA consider the DOT specification marking requirements of §178.345-14 to require original manufacture under the DOT specification, or may a cargo tank originally manufactured under another specification be subsequently certified as DOT 406 when compliance with all DOT 406 requirements is demonstrated?
3. Would the provisions for variable specification cargo tanks in §178.345-14(e) permit a cargo tank that conforms to both SCT 306 and DOT 406 requirements to display both specifications or otherwise operate under either specification, provided all applicable documentation and certifications are maintained?
4. If PHMSA does not consider the above circumstances sufficient for DOT 406 certification, what regulatory mechanism would be required to authorize an SCT 306 cargo tank that fully complies with DOT 406 requirements to display DOT 406 specification markings and operate as a DOT 406 cargo tank in U.S. hazardous materials transportation?

5. Are there any existing PHMSA interpretations, approvals, or special permits addressing the certification, recertification, or marking of cargo tanks manufactured under foreign specifications that are equivalent to or fully compliant with DOT cargo tank specifications?

We appreciate PHMSA's assistance in clarifying these requirements. Please contact us if additional technical information would be helpful in evaluating this request.

Respectfully submitted,



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