



26-0089
Jacobson, N.

Letter of Interpretation Request

1 message

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

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

Mon, Jul 6,

Good afternoon,

Please see the below interpretation request.

The mailing address is:

[8063 Cavershamwood Ln.](#)

[Germantown, TN 38138](#)

Let us know if you need anything,

Janaye

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

From: **chris cupp** <contact@apexdispensingsystems.com>

Date: Fri, Jul 3, 2026 at 7:25 PM

Subject: TriFlow Service Skid- Compliance

To: <phmsa.hm-infocenter@dot.gov>

Dear Sir or Madam,

Apex Dispensing Systems respectfully requests a formal interpretation regarding the application of the Hazardous Materials Regulations Parts 171–180) to our TriFlow Service Skid.

The TriFlow Service Skid is a removable truck-mounted service platform designed for contractors, municipalities, utility companies, municipal operations, agricultural operations, and fleet owners to service and refuel their own equipment in the field. The unit is intended solely as a service platform and is not designed or marketed as a cargo tank motor vehicle or as equipment for the commercial sale or retail dispensing.

The current configuration includes:

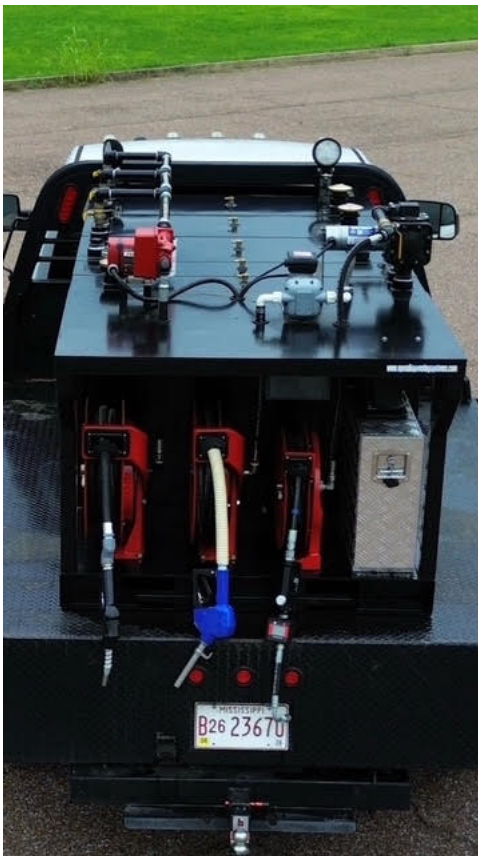
- Three independent 100-gallon diesel fuel tanks.
- One 50-gallon diesel exhaust fluid (DEF) tank.
- One 50-gallon hydraulic fluid tank.
- Air compressor.
- Grease dispensing system.
- Tool storage compartment.
- Integrated dispensing equipment.

Each diesel tank is a separate vessel and is independently constructed. The tanks are mounted on a common steel skid to facilitate installation and removal from a truck or service body. The diesel tanks are not intended to function as a single 300-gallon tank.

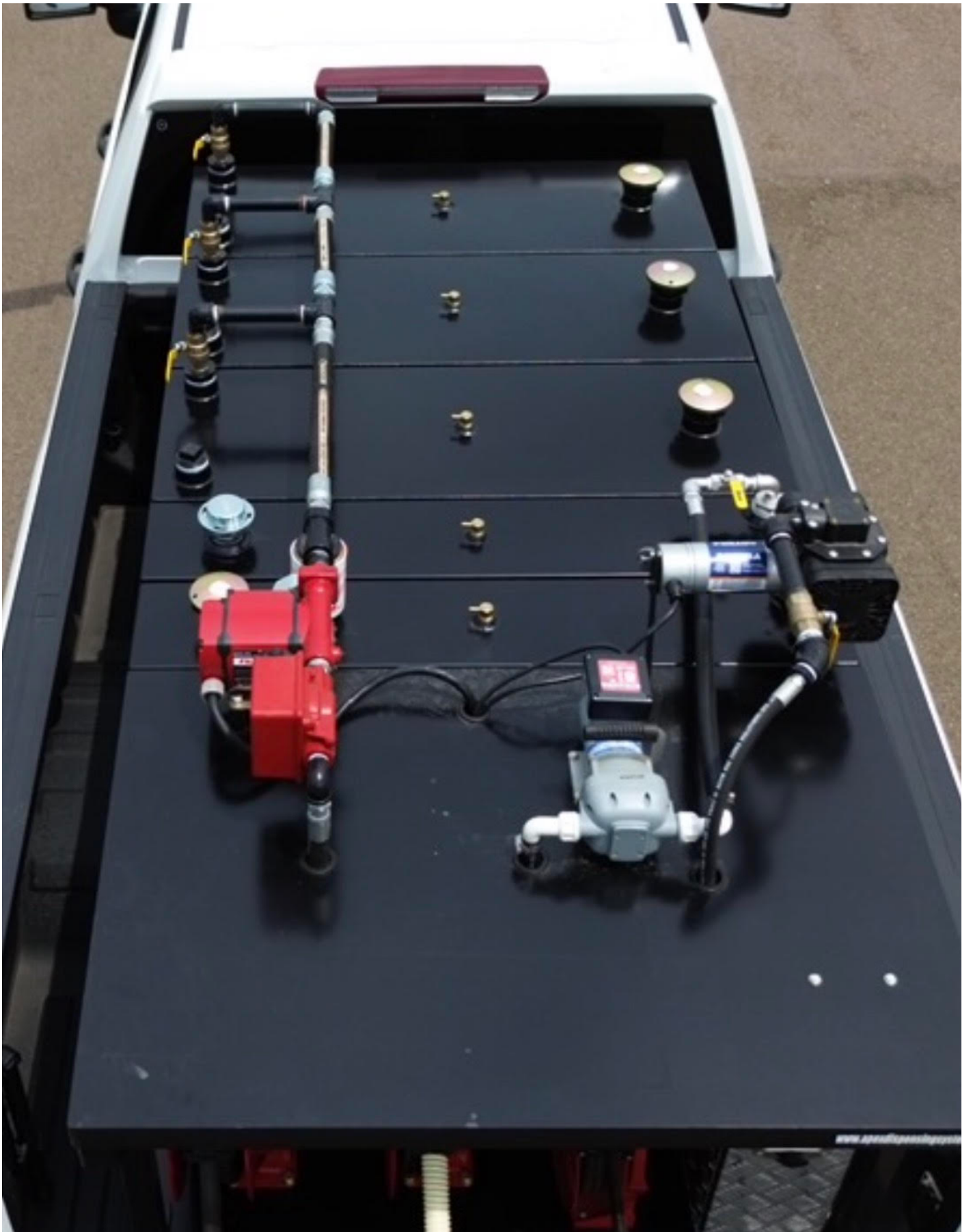
Apex requests PHMSA's guidance on the following questions:

1. For purposes of the Hazardous Materials Regulations, are the three 100-gallon diesel tanks considered separate non-bulk packaging assuming the final plumbing configuration prevents unrestricted transfer of product between tanks during transportation?
2. Does mounting multiple independent tanks on a common skid alter their classification under the Hazardous Materials Regulations?
3. Does the inclusion of separate 50-gallon DEF and hydraulic fluid tanks affect the federal transportation classification of the diesel fuel system?
4. Based on the attached engineering drawings and plumbing schematic, are there any additional federal design, marking, or transportation requirements that Apex should satisfy before manufacturing and selling this product within the United States?
5. Are there any additional regulatory provisions within 49 CFR Parts 171–180 that PHMSA recommends Apex evaluate before commercial production?

Enclosed are photographs













to assist with your review.

We appreciate PHMSA's guidance regarding the proper application of the Hazardous Materials Regulations to this product and look for your response.

Chris Cupp
President
833-853-2749 (Office)
www.apexdispensingsystems.com

