

Good afternoon,

Please see the attached interpretation request.

Let us know if you need anything,

Janaye

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

From: **Daniel Brtis** <daniel.brtis@ocenco.com>

Date: Mon, Jul 13, 2026 at 10:57 AM

Subject: Ocenco Incorporated Request for Interpretation - 49 CFR 178.65

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

Hello,

Please see the attached request for interpretation.

Best Regards,

Daniel Brtis

Engineering Manager

Ocenco Inc.

10225 82nd Ave

Pleasant Prairie, WI 53158-5801

mobile: +1 (262) 237-5898

office: +1 (262) 947-9000 x243

email: daniel.brtis@ocenco.com

website: www.ocenco.com

CONFIDENTIALITY NOTICE:

This email message, including any attachments, is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message.



LakeView Corporate Park
10225 82nd Avenue
Pleasant Prairie, WI U.S.A.
53158-5801

Phone: (262) 947-9000
Fax: (262) 947-9020

9 July 2026

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

Dear Mr. Kelley,

Ocenco Incorporated requests DOT interpretation of 49 CFR §178.65.

Question #1: Can a seamless non-refillable 304 stainless-steel cylinder, having a water capacity of 10.13 cubic inches and a service pressure of 4,180 psig, be classified as a DOT Specification 39 cylinder?

Ocenco Interpretation: Section 178.65 does not specify a maximum service pressure for a DOT Specification 39 cylinder. Ocenco therefore believes that a seamless non-refillable stainless-steel cylinder having a service pressure of 4,180 psig may qualify as a DOT Specification 39 cylinder, provided it does not exceed the applicable water-capacity limits and satisfies all other requirements of §178.65.

Question #2: Can the required markings of a DOT Specification 39 cylinder be either:

1. Laser-engraved markings on the sidewall, provided that the marking is not injurious to the cylinder
2. Durable and waterproof stenciled markings on the sidewall

Ocenco Interpretation: Section 178.65(i)(1) states:

"The markings required by this section must be durable and waterproof. The requirements of §178.35(h) do not apply to this section."

Because §178.35(h) does not appear to exist, Ocenco believes this reference appears to be a typographical error and requests PHMSA clarification regarding its intended meaning.



LakeView Corporate Park
10225 82nd Avenue
Pleasant Prairie, WI U.S.A.
53158-5801

Phone: (262) 947-9000
Fax: (262) 947-9020

If the marking requirements of §178.35(f) were not intended to apply to Specification 39 cylinders, Ocenco believes that the following two options would satisfy the requirements of §178.65(i)(1):

1. Laser-engraved markings on the sidewall, provided that the marking is not injurious to the cylinder
2. Durable and waterproof stenciled markings on the sidewall

Ocenco respectfully requests PHMSA's interpretation of the questions presented above and whether PHMSA agrees with Ocenco's understanding of the applicable requirements. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel J. Brtis", is written over a horizontal line.

Daniel J. Brtis
Engineering Manager

Ocenco Incorporated
10225 82nd Ave
Pleasant Prairie, WI 53158-5801
Office: +1 (262)-947-9000
Mobile: +1 (262)-237 5898
daniel.brtis@ocenco.com