



26-0099
Baker

Fwd: Request for Interpretation - Applicability of DOT Cargo Tank Requirements to UN Portable Tanks

Wed, Jul 22, 2026 at 2:48 PM

Good afternoon,

Please see the following request for an Letter of Interpretation. Let us know if you need anything else.

Best,

Aminah

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

From: **Joshua Ramcharan** <jramcharan@mewl.com>

Date: Wed, Jul 22, 2026 at 10:24 AM

Subject: Request for Interpretation - Applicability of DOT Cargo Tank Requirements to UN Portable Tanks

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

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22-July-2026

Mr. Shane Kelley
Director, Standards and Rulemaking Division
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration (PHH-10)
[1200 New Jersey Avenue, SE](#)
East Building, 2nd Floor
Washington, DC 20590

Subject: Request for Interpretation - Applicability of DOT Cargo Tank Requirements to UN Portable Tanks

Dear Mr. Kelley,

I am requesting a written interpretation regarding whether a UN portable tank is considered distinct from a DOT specification cargo tank for the purposes of facility registration and repair requirements under the Hazardous Materials Regulations (HMR).

My understanding is that:

- UN portable tanks are designed, approved, inspected, and tested under the requirements applicable to portable tanks in 49 CFR Part 178, Subpart G, and applicable inspection requirements in 49 CFR Part 180. These tanks are approved through a designated approval agency in accordance with the applicable regulations.
- DOT specification cargo tanks are regulated under separate provisions of the HMR and are subject to the cargo tank requirements contained in 49 CFR Part 178, Subpart J, and applicable requirements in 49 CFR Part 180.

In light of the above, I respectfully request PHMSA's interpretation of the following questions:

1. Does PHMSA consider a UN portable tank regulated under 49 CFR Part 178, Subpart G, to be a "DOT specification cargo tank" for the purposes of the cargo tank facility registration requirements under 49 CFR Part 107, Subpart F?
2. If a facility performs repairs to the pressure boundary of a UN portable tank in accordance with the National Board Inspection Code (NBIC) under a valid National Board "R" Certificate of Authorization, and the facility does not perform repairs on DOT specification cargo tanks, is that facility required to register under 49 CFR Part 107, Subpart F solely because it performs repairs to UN portable tanks?

The purpose of this request is to ensure that our facility complies with all applicable DOT requirements and to clarify whether regulatory requirements applicable to DOT specification cargo tanks are also applicable to UN portable tanks.

Thank you for your time and consideration. I appreciate any clarification DOT can provide regarding this matter.

Respectfully,

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Warmest Regards,

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