



26-0100
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Fwd: Guidance on Hazmat Compliance for CA Pilot

Chambers, Casey <casey.chambers@dot.gov>
To: "Jacobson, Noah (PHMSA)" <noah.jacobson@dot.gov>
Cc: "Pollack, Arthur (PHMSA)" <arthur.pollack@dot.gov>

Fri, Jul 24, 2026 at 7:52 AM

Good morning,

Would you be willing to process the original question and supplementary details as an LOI? Please let me know if anything else is required on my end.

V/r,



Casey Chambers
Transportation Specialist
PHH-6/PHMSA
U.S. Department of Transportation
(202) 941-8195
casey.chambers@dot.gov

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

From: **Disha More** <disha.more@lnkenergies.com>
Date: Thu, Jul 23, 2026 at 11:54 AM
Subject: Re: Guidance on Hazmat Compliance for CA Pilot
To: Chambers, Casey <casey.chambers@dot.gov>
Cc: Sayandeep Biswas <sayandeep@lnkenergies.com>, Alexis Huynh <alexis@lnkenergies.com>

Hi Casey,

Thank you for the update! Yes, we would love for you to forward this to the Standards and Rulemaking division to begin that process.

Please let us know if you need any additional information from our side to get started.

Best regards,
Disha More
LNK Energies

From: Chambers, Casey <casey.chambers@dot.gov>
Sent: Thursday, July 23, 2026 06:57
To: Disha More <disha.more@lnkenergies.com>
Subject: Re: Guidance on Hazmat Compliance for CA Pilot

Good morning Disha,

Thank you for clarifying the system details. The interpretations provided continue to apply to the situations described in the previous letters of interpretation.

If your company would like PHMSA to issue a letter of interpretation determining whether your exact scenario qualifies as

a fuel tank, PHMSA can provide that. However, the request would need to be processed by our Standards and Rulemaking division. Would you like me to forward this email chain to them to begin that process?

Best regards,



Casey Chambers
Transportation Specialist
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On Tue, Jul 21, 2026 at 10:45 AM Disha More <disha.more@lnkenergies.com> wrote:

Hi Casey,

Thank you for your previous response and the two interpretation letters, they were very helpful.

I wanted to follow up with one clarification about our system, as it differs slightly from a traditional fuel setup:

- Our truck carries Benzyltoluene (BT) onboard in a permanently mounted tank
- BT is not burned directly, it acts as a hydrogen carrier
- Onboard, a compact unit extracts hydrogen from the BT
- That released hydrogen powers our fuel cell, which drives the truck
- The remaining empty BT is recycled back to our depot, it is never delivered as cargo

The sole purpose of the H12-BT onboard tank is to supply fuel for the operation of our vehicle, consistent with the fuel tank definition under 49 CFR § 171.8.

Could you confirm that LNK's onboard H12-BT system qualifies as a fuel tank under 49 CFR § 171.8 and is therefore exempt from HMR?

Happy to provide any additional technical details if needed.

Best regards,
Disha More
Business Development Intern
LNK Energies

From: Chambers, Casey <casey.chambers@dot.gov>

Sent: Thursday, July 2, 2026 10:43

To: Disha More <disha.more@lnkenergies.com>

Subject: Guidance on Hazmat Compliance for CA Pilot

Good morning,

The Hazardous Materials Regulations (HMR) do not appear applicable to your use case. Can you please confirm whether the liquid fuel storage for the vehicle is solely used for vehicle propulsion? If so, it would likely meet the definition of a fuel tank (49 CFR 171.8 "Fuel Tank).

"*Fuel tank* means a tank other than a cargo tank, used to transport flammable or combustible liquid, or compressed gas for the purpose of supplying fuel for propulsion of the transport vehicle to which it is attached, or for the operation of other equipment on the transport vehicle."

I have attached two interpretation letters which may be relevant to this scenario. If the fuel tank is applicable to transportation in commerce, or if you would like to discuss this further, please let me know.

Best regards,



Casey Chambers
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