



07.23.2026

Associate Administrator for Hazardous Materials Safety
Pipeline and Hazardous Materials Safety Administration
U.S. Department of Transportation

Subject: Request for Letter of Interpretation – Mobile on-demand biodiesel fuel trailer

Dear Sir or Madam,

Optimus Technologies, Inc. respectfully requests a formal Letter of Interpretation regarding the applicability of the Hazardous Materials Regulations (49 CFR Parts 171–180) to a proposed mobile on-demand fuel trailer.

The proposed unit consists of an approximately 6,000-9,200-gallon DOT-406/407 compliant fuel tank trailer for storing and dispensing a Class IIIB fuel; ASTM D6751 B100 biodiesel(biodiesel at 100% concentrations) which has a flash point greater than 200 degrees Fahrenheit, and provides temporary, on-demand fleet refueling. The trailer incorporates UL-listed components including fuel pump and nozzle, hose reel, emergency shutdown controls, tank monitoring equipment, overfill protection, grounding and bonding provisions, and onboard spill response equipment.

The system is intended exclusively for temporary behind-the-fence commercial fleet fueling and is not intended to function as a permanent or retail fueling installation. A safety and operation training plan will be instituted between Optimus and the customer to ensure that all customer personnel that fuel their motor vehicles understand the procedures for using the system. A Spill Prevention, Control, and Countermeasure (SPCC) plan will also be instituted with the end user based on 40 CFR Part 112 and will be tailored to each individual site in which the unit will be deployed.

Optimus is designing the unit with the intent of complying with:

- 49 CFR Parts 171–180
- 40 CFR Part 112(SPCC)
- NFPA 10
- NFPA 30-30A
- NFPA 385
- NFPA 70
- NFPA 77
- OSHA 29 CFR 1910.106



We respectfully request PHMSA's interpretation regarding:

1. Whether the proposed configuration as described remains compliant as a DOT cargo tank motor vehicle after integration of the frame-mounted dispenser pump, hose reel, electrical controls, and associated fueling equipment; including all safety equipment laid out in the forementioned regulations.
2. Whether Parts 171–180 contain additional requirements governing on-frame mounted fueling equipment.
3. Whether temporary fleet fueling directly from the cargo tank vehicle dispensing equipment introduces additional regulatory obligations not listed under the previously mentioned regulations.
4. Whether PHMSA identifies concerns regarding unloading of class IIIB-B100 biodiesel using this configuration and what placards are required.

If any questions arise after the review of this request, please reach out to j.ewing@optimustec.com.

Optimus appreciates PHMSA's assistance in providing regulatory clarity before commercialization.

Respectfully,

A handwritten signature in black ink, appearing to read "Jonathan Ewing".

Jonathan Ewing
Vice President, Strategic Initiatives & Co-Founder
Optimus Technologies, Inc.
Pittsburgh, Pennsylvania