Casey, C.
26-0062

Fwd: Request for Regulatory Interpretation - Portable Tank Quantity Limits and Heel Restrictions

1 message

INFOCNTR (PHMSA) <infocntr.infocntr@dot.gov> Wed, May 13, 2026 at 3:15 PM
To: "Baker, Yul (PHMSA)" <yul.baker@dot.gov>
Cc: Hazmat Interps <hazmatinterps@dot.gov>

Good afternoon,

Please see the following letter of interpretation request. Let us know if you need anything else.

Best,

Aminah

---------- Forwarded message ---------
From: **Blayze Schrepfer** <bschrepfer@fortrexsolutions.com>
Date: Wed, May 13, 2026 at 3:08 PM
Subject: Re: Request for Regulatory Interpretation - Portable Tank Quantity Limits and Heel Restrictions
To: INFOCNTR (PHMSA) <infocntr.infocntr@dot.gov>

Hi, Aminah.

My physical address is:

1501 E 8th St
North Little Rock, AR 72114

Thanks,

Blayze Schrepfer
EHS Manager
501-518-4292
WWW.FORTREXSOLUTIONS.COM
FORTREX

From: INFOCNTR (PHMSA) <infocntr.infocntr@dot.gov>
Sent: Wednesday, May 13, 2026 3:00 PM
To: Blayze Schrepfer <bschrepfer@fortrexsolutions.com>
Subject: Re: Request for Regulatory Interpretation - Portable Tank Quantity Limits and Heel Restrictions

NOTE: It looks like you haven't received an email from this address before: infocntr.infocntr@dot.gov. Please make sure this is a legitimate message.

Dear Blayze,

We have received your request for a written letter of interpretation regarding the hazardous materials regulations (49 CFR Parts 171-180). The hazardous materials regulations are available at the following URL:

https://www.phmsa.dot.gov/phmsa-regulations

However, before we can submit your request for processing, please respond to this email with:

- Physical Mailing Address

Sincerely,

Aminah, Hazardous Materials Specialist

An e-mail response from this office is considered informal guidance. Formal guidance may be requested in accordance with 49 CFR 105.20. https://www.phmsa.dot.gov/standards-rulemaking/hazmat/hazardous-materials-information-center

On Wed, May 13, 2026 at 2:08 PM Blayze Schrepfer <bschrepfer@fortrexsolutions.com> wrote:

> Dear PHMSA Hazmat Information Center,
>
> I am writing to request clarification on two regulatory questions regarding the transportation of hazardous materials in UN portable tanks (ISO tank containers/Isotainers). We have reviewed the applicable sections of 49 CFR but require official interpretation to ensure compliance.
>
> **QUESTION 1: Organic Peroxide Quantity Limit**
>
> Is there a 40,000 pound (18,000 kg) maximum quantity limit for transporting UN-3119 (Organic Peroxide Type F, Liquid, Temperature Controlled - specifically peroxyacetic acid formulations) in UN portable tanks/ISO tank containers under 49 CFR 173.225?
>
> We have reviewed 49 CFR 173.225 and the Organic Peroxide Portable Tank Table (Table 4 to paragraph (g)) but cannot locate a specific 40,000 pound or 4,250 gallon limit for UN-3119. If such a limit exists, please cite the specific regulation section and paragraph.
>
> The product in question is an antimicrobial agent containing 21-26% peroxyacetic acid, 40-55% acetic acid, and 5-10% hydrogen peroxide, classified as UN-3119.
>
> **QUESTION 2: Sodium Hydroxide Heel Volume Restrictions**
>
> Are there any DOT regulations that restrict the heel (residual product) volume to 925 gallons or any other specific amount for Sodium Hydroxide solution (32-50% concentration, UN1824, Class 8) in tank trailers or ISO tank containers?
>
> We are aware of 49 CFR 173.29 (Empty packagings) which addresses when tanks containing residue must be transported as hazardous materials. However, we are seeking clarification on whether any volume-

specific restrictions exist for heels of corrosive materials in bulk containers, or if the only requirement is compliance with 49 CFR 173.29 regardless of heel volume.

REQUEST FOR WRITTEN RESPONSE

We respectfully request a written interpretation that we can reference for compliance purposes. If these questions have been previously addressed in published interpretations, please direct us to the relevant interpretation numbers.

Thank you for your assistance. Please let me know if you require any additional information to process this request.

Best regards,

Blayze Schrepfer
EHS Manager
501-518-4292
WWW.FORTREXSOLUTIONS.COM

U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

October 6, 2026

Blayze Schrepfer
EHS Manager
FORTREX
1501 E 8th St.
North Little Rock, AR 72114

Reference No. 26-0062

Dear Mr. Schrepfer:

This letter is in response to your May 13, 2026 email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the transport of bulk materials, specifically, organic peroxides in portable tanks and residues of sodium hydroxide in cargo tanks or portable tanks.

We have paraphrased and answered your questions as follows:

Q1. Is there a 40,000 pound (18,000 kg) maximum quantity limit for transporting "UN3119, Organic Peroxide Type F, Liquid, Temperature Controlled (*i.e.*, for peroxyacetic acid formulations) in UN portable tanks (ISO tank containers) under § 173.225?

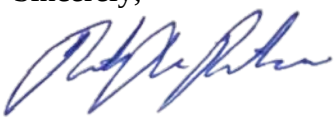
A1. No. The HMR does not specify a general maximum quantity limit for organic peroxides contained in portable tanks. While there is not a maximum volume or weight limit for organic peroxides transported in portable tanks, the degree of filling may not exceed 90% at 15 °C, as provided in § 173.225(h)(3)(xi).

Q2. Does the HMR restrict the heel (*i.e.*, the residue) volume to 925 gallons or any other specific amount for Sodium hydroxide solution (UN1824, Class 8 at 32-50% concentration) in cargo tanks or portable tank?

A2. No. The HMR do not specify limits for residue amounts of hazardous material allowed in a packaging. However, in accordance with § 173.29, an empty packaging containing the residue of a hazardous material must be offered for transportation and transported in the same manner as when the packaging previously contained a greater quantity of that hazardous material.

I hope this information is helpful. Please contact us if we can be of further assistance.

Sincerely,



Dirk Der Kinderen
Chief, Standards Development Branch
Standards and Rulemaking Division