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

1200 New Jersey Avenue, SE
Washington, DC 20590

October 14, 2026

Greg Miller
Lead Safety & Technical Trainer
Thompson Gas
8895 Canyon River Court
Sparks, NV 89434

Reference No. 26-0103

Dear Mr. Miller:

This letter is in response to your July 14, 2026 email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the transportation of ASME propane storage containers, with respect to requirements for consumer storage containers, specifically, § 173.315(j)(2). You note that § 171.8 defines neither "storage container" nor "consumer storage container." You also present a transport scenario involving an ASME storage container that: (1) does not exceed 500 gallons water capacity; (2) contains more than 5 percent propane; (3) is being transported by a private motor carrier; and (4) is being moved one way from the consumer's premises to the container owner's nearest facility and ask several related questions.

We have paraphrased and answered your questions as follows:

Q1. What does the phrase "only one storage container" mean in the context of § 173.315(j)(2)(iv)?

A1. As you correctly noted, the HMR does not specifically define "(consumer) storage container" in § 171.8. However, the phrase "only one storage container" means a single consumer storage container intended for permanent installation on consumer premises and does not refer to HMR authorized transport packagings, such as a DOT specification cylinder.

Q2. Under § 173.315(j)(2), may a transport vehicle carrying one qualifying ASME consumer propane storage container containing more than 5 percent propane under the applicable transportation exception also transport one or more DOT specification propane cylinders (*e.g.*, a 100-lb. propane cylinder)?

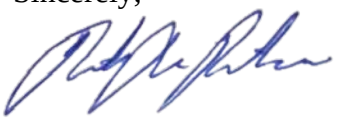
A2. Yes. Section 173.315 does not prohibit, or otherwise address, the transportation of additional hazardous materials packages, such as a DOT specification cylinder filled with propane, on the same vehicle. Such transportation is authorized, as long as all applicable transportation requirements (*e.g.*, segregation) are met. However, note that the intent of § 173.315(j) is to allow for limited movement of consumer propane storage containers, which are not otherwise authorized for transportation, without having to first empty the tanks. Further, while § 173.315(j) does not prohibit other hazardous materials packages on the vehicle, (j)(2) specifies one-way movement from the consumer to the owner's nearest facility, such that intermediate stops for dropoffs or pickups are not allowed.

Q3. If additional DOT specification propane cylinders are transported on the same vehicle as the consumer storage container, does it make a difference whether the DOT specification cylinders contain propane products or only propane residue? If so, how does the presence of product versus residue affect the interpretation or application of § 173.315(j)(2)(iv)?

A3. No. Generally, empty packagings containing only the residue of a hazardous material are treated in the same manner as when filled. See § 173.29 for further information on requirements for empty packagings.

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

Sincerely,



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

THOMPSON GAS
TRAINING RESOURCE CENTERS

Ref. No. 26-0103
Horne, T.

July 14, 2026

Director, Standards and Rulemaking Division

Mr. Shane Kelley
U.S. DOT/PHMSA (PHH-10)
1200 New Jersey Avenue, SE
East Building, 2nd Floor
Washington, DC 20590

Subject: Request for Letter of Interpretation Regarding 49 CFR § 173.315(j)(2)(iv)

Dear Mr. Kelley:

I am requesting clarification of the phrase "only one storage container" in 49 CFR § 173.315(j)(2)(iv).

Our company transports ASME propane storage containers that are intended for permanent installation at consumer premises. The scenario in question involves an ASME container that:

- Does not exceed 500 gallons water capacity.
- Contains more than 5% propane.
- Is being transported by a private motor carrier.
- Is being moved one way from the consumer's premises to the container owner's nearest facility.

Section 173.315(j)(2)(iv) states:

"Only one storage container may be transported on a motor vehicle."

Section 171.8 does not appear to define "storage container" or "consumer storage container." However, § 173.315(j)(2) describes the storage container as an ASME Section VIII container intended for permanent installation at consumer premises. A DOT specification cylinder is a different type of packaging.

Assume that the vehicle is carrying one qualifying ASME consumer storage container containing more than 5% propane. May the same vehicle also carry one or more properly prepared DOT specification propane cylinders, such as a 100-pound DOT cylinder containing liquid propane, provided that each cylinder independently complies with all applicable filling, marking, labeling, valve-protection, securement, shipping-paper, and placarding requirements?

More specifically, does the phrase "only one storage container" mean:

1. Only one ASME consumer storage container described by § 173.315(j)(2) may be transported on the vehicle, but additional DOT cylinders are not prohibited; or
2. The ASME consumer storage container must be the only propane package or hazardous-material package of any type transported on the vehicle?

Please also clarify whether the answer changes when the additional DOT cylinders contain propane product versus only propane residue. Thank you for your assistance.

Respectfully,

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