



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

1200 New Jersey Avenue, SE
Washington, DC 20590

May 4, 2021

Shawn Shoemake
HSEQ Director
TETRA Technologies
24955 Interstate 45N
The Woodlands, TX 77380

Reference No. 21-0029

Dear Mr. Shoemake:

This letter is in response to your March 17, 2021, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to bulk packaging requirements for low hazard materials as specified in § 173.241. Specifically, you ask whether you may transport “UN3264, Corrosive liquid, acidic, inorganic, n.o.s, 8, PG III” in a non-specification cargo tank motor vehicle that is suitable for transporting liquids.

The answer is yes. Column (8C) of the Hazardous Materials Table (HMT; § 172.101) prescribes requirements for bulk packagings for a given material, subject to limitations, requirements, and additional authorizations of Columns (7) and (8B). The HMT entry for “UN3264, Corrosive liquid, acidic, inorganic, n.o.s, 8, PG III,” lists § 173.241 in Column (8C), which authorizes bulk packagings for certain low hazard liquid and solid materials. In addition to various DOT specification cargo tank motor vehicles, § 173.241(b) also permits the use of non-DOT specification cargo tank motor vehicles suitable for the transport of liquids. Please note that although a non-DOT specification cargo tank motor vehicle is authorized, it is your responsibility to determine whether it is compatible with the lading per § 173.24(e).

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

Sincerely,

A handwritten signature in blue ink that reads "T. Glenn Foster".

T. Glenn Foster
Chief, Regulatory Review and Reinvention Branch
Standards and Rulemaking Division

From: [INFOCNTR \(PHMSA\)](#)
To: [Hazmat Interps](#)
Subject: FW: Interpretation Request for Transporting UN 3264
Date: Thursday, March 18, 2021 1:14:20 PM

21-0029

Hello,

Below is a request for letter of interpretation.

Thanks,

Jonathon, HMIC

From: Shawn Shoemake [mailto:SShoemake@tetratec.com]
Sent: Wednesday, March 17, 2021 12:19 PM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Subject: Interpretation Request for Transporting UN 3264

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

March 17, 2021

Dear Sir or Madam:

I am writing for a written interpretation following a discussion with the US Department of Transportation, Pipeline and Hazardous Materials Transportation Hotline regarding 49 CFR 173.241(b).

We wish to transport Zinc Bromide-Calcium Bromide (UN 3264; Class 8; PK III) via bulk cargo tank. We request interpretation guidance on transporting the material in a non-DOT regulated cargo tank, "suitable for transporting liquids". The hotline specialist verbally confirmed our interpretation is correct and it is authorized under the regulation to transport UN3264 in a non-DOT bulk cargo tank, suitable for transporting liquids, such as a vacuum truck that meets the requirements for "cargo tank motor vehicles" as specified in the regulations.

Subpart F — Bulk Packaging for Hazardous Materials Other Than Class 1 and Class 7,

§173.241 Bulk packaging for certain low hazard liquid and solid materials.

(b) Cargo tanks: DOT specification MC 300, MC 301, MC 302, MC 303, MC 304, MC 305, MC 306, MC 307, MC 310, MC 311, MC 312, MC 330, MC 331, DOT 406, DOT 407, and DOT 412 cargo tank motor vehicles; and non-DOT specification cargo tank motor vehicles suitable for transport of liquids.

Best regards,

Shawn Shoemake

ShawnShoemake
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