Transportation/Hazardous Materials: Pipeline and Hazardous Materials Safety Administration Interpretive Letter Addressing Bulk Packaging

Walter Wright, Jr.
wwright@mwlaw.com
(501) 688.8839

04/13/2026

The Pipeline and Hazardous Materials Safety Administration ("PHMSA") addressed in a March 24th interpretive letter the application of the Hazardous Materials Regulations ("HMR") applicable to bulk packaging. See Reference No. 25-0147.

PHMSA was responding to an October 27, 2025, letter from the Lead Safety & Technical Trainer of Thompson Gas ("TG").

TG asked whether a 120-gallon American Society of Mechanical Engineers (ASME) propane container is bulk or non-bulk by water weight as a receptacle for a gas, as specified by 49 CFR § 171.8.

PHMSA responds that the definition of a bulk packaging in § 171.8 states that a container with a water capacity greater than 454kg (1000 pounds) as a receptacle for a gas, as defined in 49 CFR § 173.115, is a bulk packaging. The agency further states that if the information provided is accurate and the container is exactly 120 gallons with a 1000.8lb water weight capacity, then the container would be a bulk packaging.

TG also asked whether the container was bulk by kilograms instead of pounds. 49 CFR § 171.10(c)(2) is noted to provide conversion rates between the International System of Units (SI) and U.S. standard measurements.

A copy of the interpretive letter can be found here.