



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

March 31, 2025

Payton den Herder
Sales Manager
HOYER Global (USA), Inc.
2100 Space Park Drive, Suite 200
Houston, TX 77058

Reference No. 24-0103

Dear Mr. den Herder:

This letter is in response to your October 23, 2024, email and subsequent email conversation requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to data plate marking requirements for United Nations (UN) portable tanks. Specifically, you describe a UN portable tank with a country of approval other than the United States (*e.g.*, the Netherlands). The UN portable tank's design was approved by an approval agency authorized to review and approve the design of UN portable tanks by the competent authority of the country of approval. The approval agency has also been authorized to approve the design of a UN portable tank by the competent authority of the United States (*i.e.*, the Pipeline and Hazardous Materials Safety Administration (PHMSA)). The approval agency maintains valid approval numbers issued by both competent authorities. Is the UN portable tank's data plate (see § 178.274(i)) required to display the approval number assigned by PHMSA, in addition to the approval number of the country of approval?

No. The data plate of a UN portable tank marked with the United States as the country of approval must display the approval number issued by PHMSA to the approval agency. The data plate of a UN portable tank marked with a country other than the United States as the country of approval is subject to the regulations and requirements of that particular competent authority. UN portable tanks with a country of approval other than the United States may be used in the United States in accordance with § 173.24(d)—see previously issued Letters of

Interpretation Reference Nos. 23-0004 and 13-0151, enclosed with this response. Moreover, regarding this scenario, the HMR does not restrict a person from permissively marking the approval number issued by PHMSA on the data plate.

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

Sincerely,

A handwritten signature in blue ink, appearing to read 'Dirk Der Kinderen', written in a cursive style.

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

From: [INFOCNTR \(PHMSA\)](#)
To: [Dodd, Alice \(PHMSA\)](#)
Cc: [Hazmat Interps](#)
Subject: FW: Resending for formal letter of interpretation: US/DOT approval NO - IA identification number for Surveying company
Date: Wednesday, October 23, 2024 2:54:23 PM
Attachments: [image002.png](#)
[image003.png](#)

Hello Alice,

Please see the below interpretation request. Let us know if you need anything.

Sincerely,
Janaye

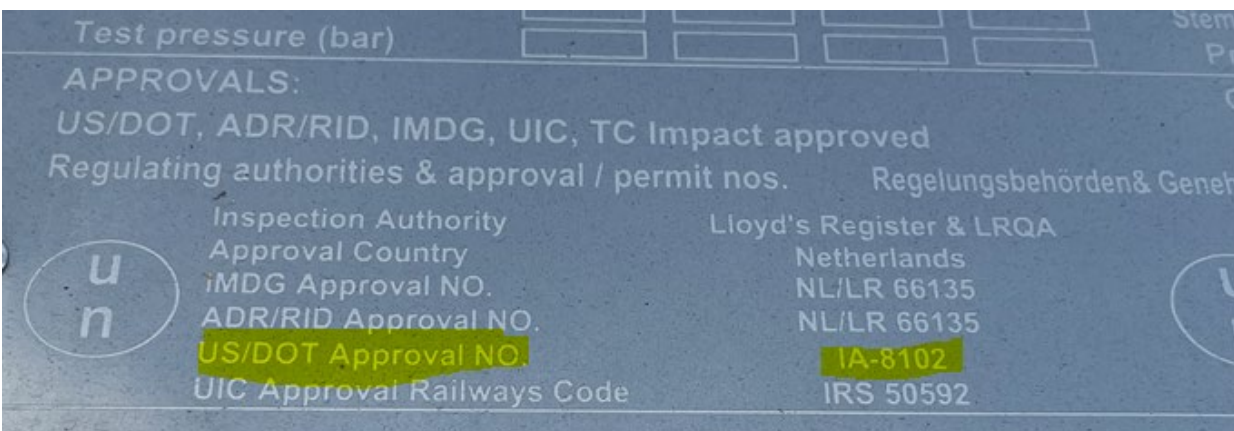
From: Payton Den Herder <P.DenHerder@HOYER-Group.com>
Sent: Wednesday, October 23, 2024 12:31 PM
To: PHMSA HM InfoCenter <PHMSAHMInfoCenter@dot.gov>; INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Subject: Resending for formal letter of interpretation: US/DOT approval NO - IA identification number for Surveying company

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.

Good day Mr. Shane Kelley,

Emailing to have in clear determination in writing on the below issue.

For portable container (ISO container) hauling bulk liquid hazardous products. Would the CSC plate on the ISO container legally be required to have the below highlighted IA number which is an identifier number for the original approving (survey) agency.



Thank you and best regards,

Payton den Herder
Sales Manager

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FMC Registration 019843N

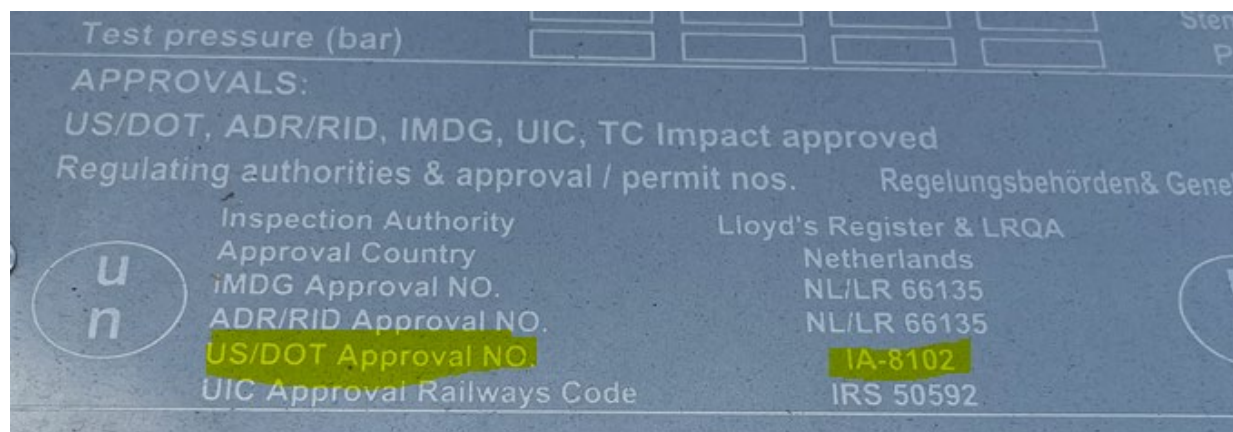


From: Payton Den Herder
Sent: Wednesday, October 23, 2024 10:36 AM
To: phmsa.hm-infocenter@dot.gov; infocntr@dot.gov
Subject: US/DOT approval NO - IA identification number for Surveying company

Good day,

Checking regulations for hauling hazardous material with ISO containers.

This is specifically in relation to 49 CFR, Section 107.402 and whether or not the identifier number for the original approving agency (IA number highlighted below as example) is required to be stamped on the data plate of the ISO container.



Thank you and best regards,

Payton den Herder
Sales Manager

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Registration Number: 24113981

Court of Registration: Chamber of Commerce Rotterdam

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