



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

April 29, 2026

Jessica Humphrey
Transportation and Logistics Lead
Beehive Industries
795 S. Potomac Street
Suite 100
Centennial, CO 80112

Reference No. 26-0014

Dear Ms. Humphrey:

This letter is in response to your January 23, 2026 email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to hazardous materials installed in equipment. Specifically, you describe a 0.3L Department of Transportation (DOT) specification cylinder containing methane that is installed in a jet engine.

We have paraphrased and answered your questions as follows:

- Q1. Is the DOT specification cylinder considered the “packaging” for the purposes of the HMR, and does the jet engine with the methane tank installed qualify for the exceptions in § 173.220?
- A1. While the cylinder is a DOT specification packaging, when attached to the jet engine, the entire apparatus constitutes the packaging, not the cylinder alone. Based on the description provided in your incoming email, the jet engine would qualify for the exceptions in § 173.220.
- Q2. Is any additional approval or DOT Special Permit required to ship the jet engine with the methane tank installed?
- A2. No. Provided the tank and jet engine properly qualify for exceptions under § 173.220, no further approval or Special Permit would be required.
- Q3. Are there any additional packaging approval or design requirements imposed on the jet engine due to the presence of the methane tank?

A3. No. See A2.

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

Sincerely,

A handwritten signature in blue ink, reading "Alexander Wolcott". The signature is fluid and cursive, with a long horizontal stroke extending from the end.

Alexander Wolcott
Acting Chief, Regulatory Review and Reinvention Branch
Standards and Rulemaking Division

From: [INFOCNTR \(PHMSA\)](#)
To: [Hazmat Interps](#)
Subject: FW: Request for Letter of Interpretation
Date: Monday, January 26, 2026 3:12:40 PM
Attachments: [image001.png](#)

Hello,

See below request for letter of interpretation.

Thanks,
Jonathon

From: Jessica Humphrey <jessica.humphrey@beehiveind.com>
Sent: Friday, January 23, 2026 5:33 PM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Subject: Request for Letter of Interpretation

You don't often get email from jessica.humphrey@beehiveind.com. [Learn why this is important](#)

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.

Dear PHMSA Hazmat Information Center,

I am requesting a formal letter of interpretation regarding the application of the Hazardous Materials Regulations to a jet engine that incorporates a methane cylinder.

Our company is planning to ship jet engines (approximately 9 inches in diameter and 30 pounds fully assembled) that have a 0.3-liter methane tank installed for functional use. The methane is contained in a DOT-certified cylinder that is manufactured, tested, marked, filled, and maintained in accordance with 49 CFR Parts 173 and 180.

We understand that if these engines are shipped by air, the methane cylinder would need to be drained or shipped separately. However, if we ship by ground transportation with the methane tank installed and filled, we are seeking clarification on the following:

1. Is the DOT-certified cylinder considered the “packaging” for purposes of the HMR under 49 CFR §§171.8, 173.220, and 173.301?
2. Provided the cylinder complies with all applicable requirements in Parts 173 and 180, is any separate DOT packaging approval or special permit required for shipping the jet engine with the methane tank installed?
3. Are there any additional sections of the HMR that would impose packaging

approval or design requirements on the jet engine due to the presence of the methane tank?

These shipments would be offered in commerce by highway.

Thank you for your assistance.



Jessica Humphrey
Transportation & Logistics Lead
Beehive Industries

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