



Commercial Vehicle Safety Alliance

Improving commercial motor vehicle safety and enforcement

June 11, 2026

The Honorable Paul J. Roberti
Administrator
Pipeline and Hazardous Materials Safety Administration
U.S. Department of Transportation
1200 New Jersey Ave., SE
Washington, DC 20590

RE: Request for clarification regarding whether manifolded cylinders with individual closures are bulk or non-bulk packages

Dear Administrator Roberti,

The Commercial Vehicle Safety Alliance (CVSA) is requesting formal clarification from the Pipeline and Hazardous Materials Safety Administration (PHMSA) on whether manifold cylinders with individual closures should be treated as bulk or non-bulk packages.

CVSA is a nonprofit organization comprised of local, state, provincial, territorial and federal commercial motor vehicle safety officials and industry representatives. The Alliance aims to prevent commercial motor vehicle crashes, injuries and fatalities and believes that collaboration between government and industry improves road safety and saves lives. Our mission is to improve commercial motor vehicle safety and enforcement by providing guidance, education and advocacy for enforcement and industry across North America.

Request

CVSA requests PHMSA issue a letter of interpretation clarifying whether manifold cylinders with individual closures should be treated as bulk or non-bulk packages for the purposes of applying the hazardous materials marking requirements found in Part 172.

Justification

During the 2026 CVSA Workshop in Chicago, Illinois, the CVSA Hazardous Materials Committee met. During the discussion, the committee considered a scenario (please see photos below) where multiple compressed gas cylinders, each with its own individual closure, have been manifolded together in a rack to be transported. When

transported individually, these cylinders are considered non-bulk packages. After the discussion, members of the CVSA Hazardous Materials Committee concluded that when transported manifolded together in a rack, as shown below, the cylinders should still be considered non-bulk packages, for the purposes of applying the hazardous materials marking requirements found in Part 172.



Compressed gas cylinders, with individual closures, manifolded together for transport.

However, after reviewing several Letters of Interpretation issued by PHMSA regarding packaging requirements for other scenarios involving cylinders, the group agreed that no clear guidance on this matter exists. Specifically, the group reviewed PHMSA Interpretation Responses:

- 21-0001, which addresses marking requirements for manifolded packages of cylinders transporting diesel fuel and gasoline;
- 10-0116, which discusses specification cylinders that are permanently mounted lengthwise to a frame attached to the vehicle's chassis; and,
- 11-0153, which addresses under what circumstances manifolded, non-bulk packagings would be considered a single bulk packaging (this interpretation also directly references Interpretation 10-0116).

Interpretation 11-0153 clarifies that:

- *“cylinders interconnected through manifolding that use a common outlet (e.g., a pressure regulator) operate as an integral unit;*
- *non-bulk cylinders that are manifolded in a tube trailer such that the aggregate capacity of the tube trailer meets the definition prescribed in § 171.8 of the HMR for a bulk packaging must be treated as one bulk packaging;*
- *individual non-bulk cylinders that are not manifolded and are designed to operate separately with their own stop valves are non-bulk packagings.”*

However, the scenario CVSA seeks clarification on, involving individual compressed gas cylinders manifolded but still designed to operate separately with their own stop valves, is not addressed in Interpretation 11-0153. As noted

above, the members of CVSA's Hazardous Materials Committee agreed unanimously that these cylinders should be treated as non-bulk packaging and CVSA requests that PHMSA issue a letter of interpretation addressing this specific scenario.

CVSA works to closely monitor, evaluate and identify potentially unsafe transportation processes and procedures as well as to help facilitate and implement best practices for enhancing safety on our roadways. Commercial motor vehicle safety continues to be a challenge and we need the involvement of all affected parties to help us better understand these issues and put into place practical solutions. We appreciate the agency's consideration of this request.

If you have further questions or comments, please do not hesitate to contact me at 202-998-1008 or collin.mooney@cvsa.org.

Respectfully,

A handwritten signature in black ink, appearing to read 'Collin Mooney'.

Collin B. Mooney, MPA, CAE
Executive Director
Commercial Vehicle Safety Alliance