



U.S. Department  
of Transportation  
**Research and  
Special Programs  
Administration**

400 Seventh Street, S.W.  
Washington, D.C. 20590

JUL 2 1999

Mr. Mark Hughes  
Polar Service Centers  
120 Cedar Springs Road  
Spartansburg, SC 29302

Ref. No. 98-0286

Dear Mr. Hughes:

This is in response to your letter dated September 21, 1998, and further clarifies our letter of September 4, 1998, regarding a suitable corrosion allowance for sulfuric acid in MC 307 cargo tanks under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you asked whether a certain unlined 316 SS MC 307 cargo tank approved for sulfuric acid in all concentrations meets the allowance specified in special provision B84 (§ 172.102).

Special provision B84 applies only to sulfuric acid in concentrations up to 65.25% and does not apply to concentrations greater than 65.25%. The requirements for non-metallic lining or a suitable corrosion allowance as stated in special provision B84 do not apply to sulfuric acid in concentrations above 65.25%

In reference to the September 4, 1998 letter we sent you, we assumed that the original design minimum thickness was not greater than 3/16". The cargo tank designer's calculated minimum thickness and the designer's corrosion allowance should be used to determine whether or not the remaining corrosion allowance is suitable.

I hope this satisfies your request.

Sincerely,

Delmer F. Billings  
Chief, Standards Development  
Office of Hazardous Materials Standards



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