



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

MAY 8 1998

Mr. Roy E. Hanson
President
Roy E. Hanson, Jr., Mfg.
1924 Compton Avenue
Los Angeles, CA 90011

Dear Mr. Hanson:

This is in response to your letter concerning requirements in the Hazardous Materials Regulations (HMR; 49 CFR parts 171 - 180) for specification MC 331 cargo tank motor vehicles. You state that you manufacture cargo tanks exclusively for transportation of propane. Your understanding of the specification for cargo tanks having a capacity of 3500 gallons or less is that a manhole is not required if the cargo tank is constructed of other than quenched and tempered steel (NQT). In addition, your understanding of the specification is that there is no requirement for an inspection opening, as provided by paragraph UG-46 of the American Society of Mechanical Engineers (ASME) Code, since propane is not corrosive to steel.

Your understanding of the HMR is not correct. Section 178.337-6(a) specifies that each cargo tank marked and certified after April 21, 1994, must be provided with a manhole conforming to paragraph UG-46 and other applicable requirements of the ASME Code. However, if the cargo tank is less than 3500 gallons and is constructed of NQT steel, it may be provided with an inspection opening conforming to UG-46 and other applicable requirements of the ASME. Therefore, if the cargo tank is constructed of NQT steel and has a capacity of 3500 gallons or less, the tank must be equipped with either a manhole or an inspection opening. Although, the ASME does not require an inspection opening, it is required by specification MC 331.

I apologize for the delay in preparing this response and hope that it has not caused you any inconvenience. If you need further assistance, please contact us.

Sincerely,

Thomas G. Allan

Senior Transportation Regulations Specialist
Office of Hazardous Materials Standards



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Thomas G. Allan
Senior Transportation Regulations Specialist
Office of Hazardous Materials Standards

178-345-8-
178-337-6

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revised:ta:4/10/98
revised:ta:4/21/98
file: 178.345-8
SC: 333

Roy E. Hanson Jr Mfg.

HM
File: 1783
SC



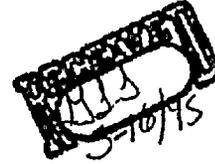
A.S.M.E. PRESSURE
VESSELS

1924 Compton Avenue ■ Los Angeles, California 90011

(213) 747 7514 (213) 747 5363

FAX: (213) 747 7724

May 8, 1995



Ed Mazzullo
Hazardous Materials Safety
400 7th Street S.W.
Washington, DC 20590

Dear Sir,

In CFR Title 49 178.332-6 a cargo tank certified after April 21, 1994, ". . . a cargo tank constructed of NQT steel having a capacity of 3500 water gallons or less may be provided with an inspection opening conforming to paragraph UG-46 and other applicable requirements of the ASME Code instead of a manhole".

Paragraph UG-46, latest, states:

(a) All pressure vessels for use with compressed air and those subject to internal corrosion or having parts subject to erosion or mechanical abrasion (see UG-25), except as permitted otherwise in this paragraph, shall be provided with suitable manhole, handhole, or other inspection openings for examination and cleaning.

We manufacture tanks exclusively for transportation of propane. These are not subject to internal corrosion. ASME, Section VIII, does not require a manway on any propane tank.

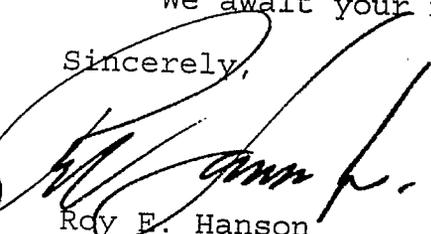
In addition:

They have a total volume less than 3,500 U.S. gallons.
They are not made from quenched and tempered steel.
Their MCC-331 nameplate states for use with propane only.

We believe the tanks as described above are not required to have a manway, or, if less than 36" I.D., are not required to have inspection openings. Are we correct?

We await your reply.

Sincerely,


Roy E. Hanson
President

Roy E. Hanson Jr. Mfg.

HM
File: 1783
SC



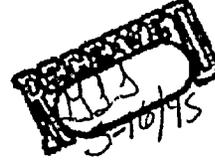
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