



U.S. Department  
of Transportation

**Research and  
Special Programs  
Administration**

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

NOV 4 1998

Mr. Raymond Schaffer  
President  
Cargo Tank Manufacturers Association  
6825 East Rosecrans Avenue  
Paramount, California 90723

Dear Mr. Schaffer:

This is in response to your letter requesting a clarification of the cargo tank weld specimen requirements under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically you ask whether test sample qualification of joint welds as was required in 49 CFR 178.340-5(d), for construction of MC 306 cargo tanks are applicable to the construction of DOT 406 cargo tanks.

The answer is no. The compliance tests prescribed in § 178.340-5(d) for MC specification cargo tanks do not apply to the DOT 400 series cargo tanks. Instead, for the DOT 400 series cargo tanks, § 178.345-4(a) states: "All joints between the cargo tank shell, heads, baffles, baffle attaching rings, and bulkheads must be welded in conformance with the ASME Code welding procedures".

I hope this satisfies your inquiry. If you need additional assistance, please do not hesitate to contact us.

Sincerely,

Hattie L. Mitchell, Chief  
Regulatory Review and Reinvention  
Office of Hazardous Materials Standards

178.340.5



**CARGO TANK MANUFACTURERS ASSOCIATION**

6825 EAST ROSECRANS AVENUE • PARAMOUNT, CALIFORNIA 90723  
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98-0219

Stevens  
§ 178.340-5

DEPARTMENT OF TRANSPORTATION  
OFFICE OF HAZARDOUS MATERIAL TRANSPORTATION  
400 SEVENTH AVE S.W. ROOM 8100  
WASHINGTON, D.C. 20590

ATTENTION: MR. EDWARD MAZZULLO

WE WOULD APPRECIATE A RESPONSE TO THE FOLLOWING QUESTION AT YOUR EARLIEST CONVENIENCE:

ARE WELD SPECIMENS AS REQUIRED UNDER MC 306 CONSTRUCTION REQUIREMENTS PART 178.340-5(d) STILL REQUIRED ?

SOME MEMBERS WHO MANUFACTURED MC 306 TANKS AND NOW MANUFACTURE DOT 406 TANKS ARE STILL SUBMITTING THESE SPECIMENS TO THE WELD LAB EVERY SIX MONTHS.. THIS WAS A REQUIREMENT FOR MANUFACTURERS AND NOT REPAIR FACILITIES. MC 306 TANKS CAN NO LONGER BE MANUFACTURED AND WE BELIEVE THIS IS NO LONGER NECESSARY OR A REQUIREMENT..

SINCERELY,

CARGO TANK MANUFACTURERS ASSOCIATION

*Raymond Schaffer*  
RAYMOND SCHAFFER  
PRESIDENT

# Interpretation Letters

**Requester** Raymond Schaffer  
**Company** Cargo Tank Manufacturers Association  
**Phone** 310-634-1245

**Date Received:** 8/4/98  
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**Concurrence**

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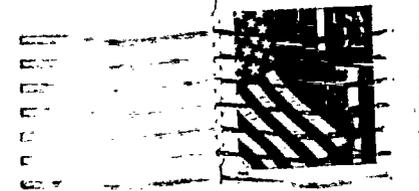
**Sign Date**  **Signor**

HBP  Copy to Docket  Copy to DHM-60

**Comment**



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