



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

APR - 4 2000

Mr. John J. Cario
Hazardous Materials Officer
Stolt Nielsen Inc.
15602 Jacintoport Blvd.
Houston, TX 77213-6438

Ref. No.99-0043

Dear Mr. Cario:

This is in response to your letter requesting clarification on minimum thickness requirements for specification IM portable tanks as specified in 49 CFR 178.270-5 and special provision T26. Your questions are paraphrased and answered below.

Q1. If the maximum cross-sectional dimensions of a specification IM 101 or IM 102 portable tank exceeds 1.8 meters (5.9 feet) is the specified minimum thickness 6.35mm (0.250 inches).

A1. Yes. In addition, for each hazardous material that makes reference to special provision T26 a minimum thickness of 6.35mm is required regardless of the tank's cross sectional dimensions.

Q2. Is the minimum thickness specified in T26 the same as the standard minimum thickness in § 178.270-5(b)(2)?

A2. Yes, they both require a minimum thickness of 6.35 mm (0.250 inches).

Q3. If the answer to Q2 is yes, can § 178.270-5(c) be used to calculate the minimum thickness for the shell and heads instead of § 178.270-5(d).



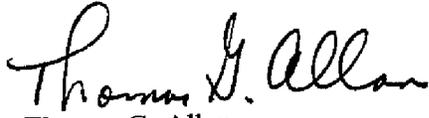
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A3. The answer is yes. Section 178.270(d) applies when other than the standard minimum thickness of the reference mild steel is specified for a tank. For example, special provision T27 requires a minimum shell thickness of 8.0mm (0.315 inch) mild steel, therefore requiring the use of the formula specified in § 178.270-5(d).

I hope this information satisfies your inquiry.

Sincerely,



Thomas G. Allan

Senior Transportation Specialist
Office of Hazardous Materials Standards

Stolt Tank Containers

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U.S. Department Of Transportation
Research And Special Programs Administration
Office Of Hazardous Materials Standards
400 Seventh Street, S.W.
Washington, D.C. 20590

February 5, 1999

Attn. Mr. Ed Mazzullo

Subject: Request For Interpretation

Dear Mr. Mazzullo,

Pusuant to discussions with Charlie Hochman of the Engineering Division, we would like the following points confirmed in writing.

Ref: 49 CFR Part 178.270-5 Minimum thickness of shells and heads.

1. For the purposes of section 178.270-5(b)(2), the standard minimum shell thickness for a tank with a maximum cross sectional dimension exceeding 1.8 meters (5.9 feet) shall be at least 6.35 mm mild reference steel. Please confirm this is the standard minimum thickness.
2. The formula used to calculate the minimum thickness of the shell and heads of each portable tank constructed of a steel other than the reference mild steel meeting the criteria stated in 178.270-5(b)(2) is the formula stated in 178.270-5(c).

Since Special Provision T-26, requires each tank to have a minimum shell thickness of 6.35 mm (.0250 inch) mild steel and this is equal to the "standard minimum thickness" described in part 178.270-5(b)(2) for tanks meeting the requirements of that section, the formula used to calculate the shell and head thickness would be the that which is contained in 178.270-5(c).

We look forward to your confirmation of the above points.

I remain,

Sincerely Yours,

A handwritten signature in cursive script that reads "John J. Cario".

John J. Cario
Stolt Nielsen Inc.
Hazardous Materials Officer