



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, D.C. 20590

FEB 25 2008

Mr. David Jones
Owner
D.J.'s Truck Repair, Inc.
7202 Herter Industrial Drive
Godfrey, IL 62035

Ref. No. 06-0260

Dear Mr. Jones:

This responds to your letter requesting clarification of the rejection criteria when performing a leakage test on a cargo tank motor vehicle that is used primarily for the transportation of compressed gases, such as anhydrous ammonia and propane, under the Hazardous materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if the back flow check valve installed on a product inlet opening (spray fill line) is considered a self-closing stop valve and, therefore, must be leak tight when leak tested under § 180.407(h). You state that when the liquid valve is opened while testing the product piping system under pressure, the back flow check valve will often leak. I apologize for the delay in responding and hope it has not caused any inconvenience.

Under § 178.337-8(a)(3), each product inlet opening must be fitted with a back flow check valve or an internal self-closing stop valve located inside the cargo tank or inside a welded nozzle that is an integral part of the cargo tank. Under the leakage test requirements in § 180.407(h), only internal or external self-closing stop valves and product piping and delivery hoses are required to be tested for leak tightness under pressure. Therefore, a back flow check valve is not required to be leak tight and would need not be considered under the rejection criteria under § 180.407(h)(3).

I trust this satisfies your inquiry. Please contact us if we can be of further assistance.

Sincerely,

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

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Stevens
§180.407 (h)
Cargo Tanks
06-0260

November 8, 2006

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Research and Special Programs Administration
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Washington, DC 20590-0001

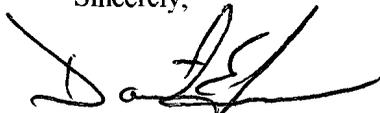
My question concerns the back check valve installed on the spray fill line of NH₃ and LP bulk transports. Specifically, is the back check valve considered a self-closing stop valve that should seal leak tight.

When conducting a leakage test per Title 49 CFR, 180.407 (h) quite often the back check valve will leak after opening the liquid valve to flood and test the product piping system. Some industry personnel claim that the back check valve should leak to stabilize the internal pressure. Others feel that if it leaks it should be replaced.

Since there is the cost of relieving the internal pressure, to replace the leaking valve, the cost of the valve and the re-pressurization of the bulk transport, I am requesting your interpretation of the condition.

Thank you for your consideration and I await your reply.

Sincerely,



David Jones
Owner