



U.S. Department
of Transportation

Pipeline and Hazardous Materials
Safety Administration

1200 New Jersey Ave., SE
Washington, DC 20590

DEC 29 2008

Mr. Chris Vleugels
Technical Department
Commercial Vehicles
Van Hool NV
Bernard Van Hoolstrat 58
B-2500 Lier Koningshooikt
Belgium

Ref. No.: 08-0151

Dear Mr. Vleugels:

This is in response to your May 5, 2008 letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) requirements applicable to portable tanks. Your scenario involves the transport of Methyl bromide, UN1062 (Division 2.3), in a UN portable tank. Specifically, you ask if Special Provision B14, which is specified in column 7 of the entry for methyl bromide, applies to the UN portable tank.

The answer is no. As noted in your letter, § 172.102(c)(3) specifies that, except as otherwise provided in the HMR, the "B" code provisions do not apply to UN portable tanks or IBCs. The packaging requirements for UN portable tanks transporting methyl bromide are specified under Special Provision T50, which refers users to § 173.313. Although Special Provision B14, which establishes insulation requirements for bulk packagings used to transport certain hazardous materials, does not apply to a UN portable tank, we strongly recommend the use of an insulated portable tank for the transportation of materials such as methyl bromide that are poisonous by inhalation.

I hope this information is helpful. If you have further questions, please do not hesitate to contact this office.

Sincerely,

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



Satterthwaite
§172.102 SP B14
Portable Tanks
08-0151

Bus and Trailer Manufacturers

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Our reference: RC/CV - 08/081

Office of Hazardous Materials Standard
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USA

Lier, May 5th, 2008

**49 CFR §172.120
Methyl bromide, UN T50 Portable tank, Special provision B14**

Dear Sirs,

We, as a manufacturer of portable tanks have a question concerning the application of special provision B14 to an UN T50-portable tank:

- Transport of methyl bromide UN1062 (class 2.3)
- Hazardous Materials Table of §172.101 Column 7: B14
- §172.102(b)(3): "*...Unless otherwise provided in this subchapter these special provisions do not apply to UN, IM Specification portable tanks or IBCs.*"
- §172.102(c)(3): "*B14 Each bulk packaging, except a tank car or a multi-unit-tank car tank, must be insulated ...*"

Our question is now: does this special provision B14 have to be applied to UN T50 portable tanks for the transport of methyl bromide UN1062?

Awaiting your reply, we remain,

with kind regards

VAN HOOL N.V.

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