



U.S. Department
of Transportation

Pipeline and Hazardous Materials
Safety Administration

1200 New Jersey Avenue SE
Washington DC 20590

FEB 10 2015

Mr. Joe Greving
Countryside Tank
Division of Iowa Steel Fabrication, LLC
1525 East Eddy Saylor Parkway
Osceola, IA 50213

Reference No. 14-0180

Dear Mr. Greving:

This is in response to your September 24, 2014 email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the general requirements for specification MC 331 cargo tanks. Your questions are answered as follow:

Q1. What is the definition of "similar reflecting color" as specified in § 178.337-1(d)(4)?

A1. The HMR does not provide a specific definition for the term "similar reflecting color."

Q2. Are there specific paint properties and/or colors that you can provide that would meet the requirements of the HMR?

A2. The HMR does not specify paint properties or colors that would be deemed as a "similar reflecting color."

Q3. Is the trailer color scheme presented in conformance with the requirements of the HMR?

A3. It is the opinion of this Office that since the majority of the color on the upper two thirds of the cargo tank is white or silver and that there is a limited amount of the light orange/red color, that the paint scheme on the cargo tank would be in compliance with § 178.337-1(4)(d).

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

Sincerely,

Shane C. Kelley
Acting International Standards Coordinator
Standards and Rulemaking Division

Goodall, Shante CTR (PHMSA)

Babich
178.337-1(4)(b)
Cargo Tanks
14-0180

From: Ciccarone, Michael CTR (PHMSA)
Sent: Friday, September 26, 2014 1:53 PM
To: Hazmat Interps
Subject: FW: 178.337-1 (Reflective Design) Question
Attachments: New Image3.JPG; New Image4.JPG

Shante and Alice,

Please submit this for a formal letter of interpretation. Mr. Greving spoke with Jordan Rivera in the HMIC and Mike Stevens, as well.

The company address is: 1525 E. Eddy Saylor Pkwy, Osceola, IA 50213

Thanks,

Mike

From: Joe Greving [<mailto:jgreving@countrySIDETANK.com>]
Sent: Wednesday, September 24, 2014 12:19 PM
To: INFOCNTR (PHMSA)
Cc: dbuchanan@countrySIDETANK.com
Subject: 178.337-1 (Reflective Design) Question

To Whom it May Concern,

Iowa Steel Fabrication, LLC ; D.B.A. Countryside Tank Company is a manufacturer of MC-331 tanker trailers. A customer recently sent the attached images to me and requested a similar paint scheme for his MC-331 trailer. For point of reference, the 2014 CFR 49 compliance guide section 178.337-1 (4) (d) *Reflective design* states the following: "Every uninsulated cargo tank permanently attached to a cargo tank motor vehicle shall, unless covered with a jacket made of aluminum, stainless steel, or other bright nontarnishing metal, be painted a white, aluminum or similar reflecting color on the upper two-thirds of area of the cargo tank."

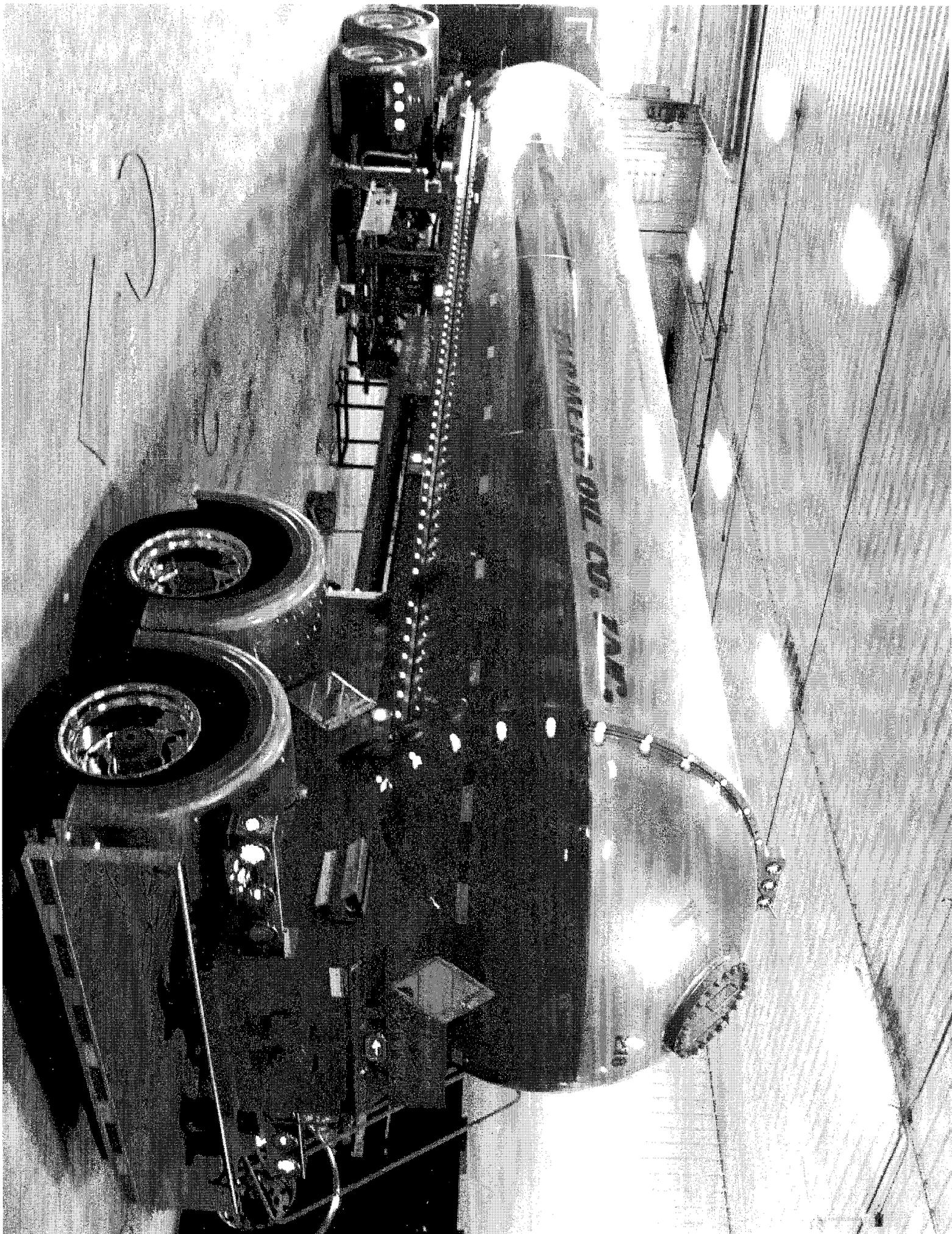
In an effort to ensure we are within code, I have three questions:

- 1) What is the definition of "similar reflecting color"
- 2) Are there specific paint properties and/or colors that you can provide us with so that we can be assured we meet code? (code is specific that white and aluminum colors are adequate, but what about the "similar reflecting color")
- 3) The images the customer has provided me with, has the orange or red "flame" on the upper two-thirds of the trailer in addition to the same color extending to the entire bottom half of the rear head and rear 1/3 of the shell . In this case, is the trailer compliant with code because the orange or red passes the "similar reflecting color"?

Thanks in advance for your assistance!

Best Regards,

Joe Greving, President
Countryside Tank
Division of Iowa Steel Fabrication, LLC
641-342-2134 (office)
515-450-8415 (cell)
www.countrysidetank.com





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

MAY 17 2011

Mr. John Anderson
Airgas SAFECOR
P.O. Box 20067
Cheyenne, WY 82003

Ref. No.: 11-0067

Dear Mr. Anderson:

This responds to your March 22, 2011 letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the general requirements for specification MC 331 cargo tanks.

In your letter, you state that your company, Airgas SAFECOR (Airgas), carries permitted hazardous materials within specification MC 331 cargo tank motor vehicles. You state that some of your MC 331 cargo tanks are painted white with a light teal stripe across the horizontal axis of the tank. Additionally, you state that your other MC 331 cargo tanks are "wrapped" in a 3M ControltacTM Graphic Film with ComplyTM v3 Adhesive. The wrap is an ultraviolet (UV) reflective material that is designed to breathe and resist fading. You provide data of the temperature tests on the striped cargo tanks and product description data for the wrap. Specifically, you ask whether the light teal stripe and the wrap are permitted under § 178.337 of the HMR.

As specified in § 178.337-1(d), every uninsulated cargo tank permanently attached to a cargo tank motor vehicle shall, unless covered with a jacket made of aluminum, stainless steel, or other bright non-tarnishing metal, be painted a white, aluminum or similar reflecting color on the upper two-thirds of area of the cargo tank.

It is the opinion of this Office that both the light teal "striped" and the "wrapped" Airgas cargo tanks as shown in the photographs and data you supplied do not conflict with § 178.337-1(d); therefore, you appear to be in compliance with this section.

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

Sincerely,

T. Glenn Foster
Chief, Regulatory Review and Reinvention Branch
Standards and Rulemaking Division

