



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

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

JAN 05 2016

Mr. Christopher J. Wagner  
AmeriGas Propane  
460 N. Gulph Rd.  
King of Prussia, PA 19406

Ref. No. 15-0242

Dear Mr. Wagner:

This is a response to your December 9, 2015 email requesting a letter of interpretation of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) regarding specification MC 331 reflective design in accordance with § 178.337-1(d). You provide a photograph of a MC331 reflective design incorporating both white and aluminum colors and a supporting reflective scale for the colors used. It is your understanding based on the information provided that your tank meets the reflective design requirements of the HMR.

Your understanding is correct. 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 aluminum and that there is a limited amount of the red and blue color in the American Flag and the AmeriGas logo, that the paint scheme on the cargo tank would be in compliance with § 178.337-1(d).

I hope this answers your inquiry. If you need additional assistance, please contact this Office again.

Sincerely,

Dirk Der Kinderen  
Chief, Standards Development Branch  
Standards and Rulemaking Division

Mitchell  
§178.337-1(d)  
Cargo Tanks  
15-0248

**Dodd, Alice (PHMSA)**

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**From:** Geller, Shelby CTR (PHMSA)  
**Sent:** Wednesday, December 09, 2015 3:27 PM  
**To:** Hazmat Interps  
**Subject:** FW: Request for Interpretation

Dear Shante and Alice,

Below is a request for a formal letter of interpretation. Mr. Wagner spoke with Eamonn.

Thanks,  
Shelby

**From:** Wagner, Christopher J. [mailto:Christopher.Wagner@americas.com]  
**Sent:** Wednesday, December 09, 2015 1:20 PM  
**To:** PHMSA HM InfoCenter  
**Subject:** Request for Interpretation

Good afternoon,

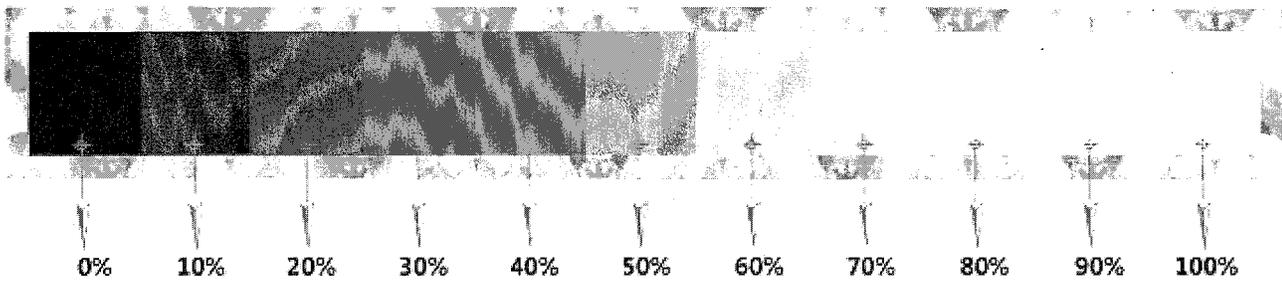
I am writing to request an interpretation of the intent of 49 CFR 178.337-1 (d) as it relates to the reflective nature of the upper two-thirds of a cargo tank barrel on MC-331 specification tanks permanently attached to a cargo tank motor vehicle.

The regulation states that 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. In a recent campaign to support our troops we have designed a wrap for our cargo tanks consisting primarily of both white and aluminum colors as pictured below:



It is our interpretation based on the below reflective scale that our tank barrel does in fact meet a reflective standard consistent with the white or aluminum requirement.

**LRV Scale** (not the same as grayscale) © LORI SAWAYA



We also believe that based on previous interpretations in this regulation that the red and blue in the American Flag and the AmeriGas logo are in limited quantity and would not impact the majority color on the upper two-thirds of the cargo tank which is white and silver. (Reference 14-0180, 11-0067, 02-0163)

Thank you in advance for your guidance and assistance.

Be Safe!

Christopher J. Wagner  
Safety Compliance and Training Director  
**AmeriGas Propane**  
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*Safety isn't expensive.....It's Priceless!*