



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, DC 20590

September 24, 2024

Scott Kerr  
Global Distribution Safety Competency Leader  
Chemours Company FC, LLC  
1007 Market Street  
P.O. Box 2047  
Wilmington, DE 19899

Reference No. 24-0031

Dear Mr. Kerr:

This letter is in response to your May 16, 2024, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the maximum service life of a multi-unit tank car tank. Specifically, you ask whether multi-unit tank car tanks meeting the test and inspection standards in accordance with § 180.519 have a maximum service life.

The answer is no. The HMR do not specify a maximum service life for a multi-unit tank car tank. Multi-unit tank car tanks must be periodically tested and inspected to remain in service, in accordance with Part 180, Subpart F. These requirements include visual inspection and pressure test as described in § 180.519.

I hope you find this information is helpful. Please contact us if we can be of further assistance.

Sincerely,

A handwritten signature in blue ink, appearing to read "Dirk Der Kinderen".

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

**From:** [INFOCNTR \(PHMSA\)](#)  
**To:** [Dodd, Alice \(PHMSA\)](#)  
**Subject:** FW: Letter of Interpretation Request  
**Date:** Friday, May 24, 2024 4:33:34 PM

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24-0031

Hi Alice,

Please see the below interpretation request. We're missing his physical mailing address at this time, but once we get it, we will forward to you.

Let us know if you need anything,

-Breanna

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**From:** Kerr, Scott E <Scott.E.Kerr@chemours.com>  
**Sent:** Thursday, May 16, 2024 11:27 AM  
**To:** PHMSA HM InfoCenter <PHMSAHMInfoCenter@dot.gov>  
**Subject:** Letter of Interpretation Request

**CAUTION:** This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

To: DOT Information Center

Re: Request for Letter of Interpretation

I am writing on behalf of The Chemours Company FC, LLC ("Chemours") to get clarification on the Hazardous Materials Regulations. My question pertains to the maximum service life of a multi-unit tank car tanks.

Multi-unit tank car tanks must comply with the retesting and requalification requirements in 49 CFR 180.519. Is there a maximum service life of a multi-unit tank car tank despite said tank car continuing to meet the retesting and requalification requirements of the aforementioned regulation?

I appreciate your time and consideration to this matter. Should you have any additional questions, please feel free to contact me at 304-863-4354.

Respectfully,

Scott Kerr

**Scott Kerr**  
**Global Distribution Safety Competency Leader**  
**Chemours Company FC LLC**

Tel: 304.863.4354

[scott.e.kerr@chemours.com](mailto:scott.e.kerr@chemours.com)



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