



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

December 20, 2024

Mitchell Rumble
EHS Director
Mann Energy Services
12257 26F St. NW
Watford City, ND 58854

Reference No. 24-0100

Dear Mr. Rumble:

This letter is in response to your October 19, 2024, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to markings on cargo tanks. Specifically, you ask whether the “Emergency Shutoff” marking requirement provided in § 172.328(d) permits the use of a hyphen in the word shutoff as follows: “SHUT-OFF”. In a follow-up email, you also provided a picture of the scenario you described.

The answer is yes. Although the required text of “Emergency Shutoff” provided in § 172.328(d) does not include a hyphen in the word shutoff, it is the opinion of this Office that inserting a hyphen as described is not contrary to the intent of the requirement and does not cause confusion, alter, or diminish the meaning or effectiveness of the marking.

I hope 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: [Hazmat Interps](#)
Subject: Request for Letter of Interpretation
Date: Monday, October 21, 2024 2:00:57 PM
Attachments: [Outlook-urvl12ig.png](#)
[Fw 49 CFR Part 172.328\(d\).msg](#)
[49 CFR Part 172.328\(d\).msg](#)

Hello Hazmat Interps,

Please see the two attached e-mails with a request for letter of interpretation. The first attached e-mail has the photo that the second attached e-mail references.

Thanks,
Jonathon, HMIC

From: Mitch Rumples <mitchr@mannenergy.com>
Sent: Monday, October 21, 2024 1:10 PM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Subject: Street address as requested

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.

Atten: Jonathan
Good Afternoon;
The physical address for Mann Energy is noted in the signature below.

Best,
Mitch R.

Mitchell J. Rumples

EHS Director



12257 26F St. NW. Watford City, ND 58854

mitchr@mannenergy.com

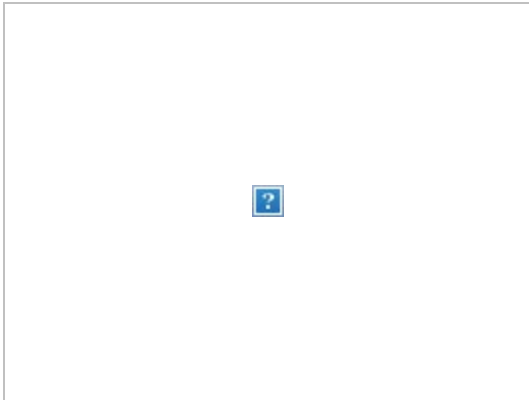
Mobile: 701-793-3373 Office: 701-842-2884

From: [Mitch Rumple](#)
To: [INFOCNTR \(PHMSA\)](#)
Subject: Fw: 49 CFR Part 172.328(d)
Date: Sunday, October 20, 2024 1:02:50 PM
Attachments: [image.png](#)
[Outlook-k0tja50f.png](#)

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.

Good Morning;

Yesterday when I sent the email asking for clarification on 49 CFR Part 172.328(d) I forgot to attach a photo of the decal in question. Please find it attached with this email for your review.



Best,
Mitch R

Mitchell J. Rumple
EHS Director



mitchr@mannenergy.com

Mobile: 701-793-3373 Office: 701-842-2884

From: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>

Sent: Saturday, October 19, 2024 10:44 AM

To: Mitch Rumble <mitchr@mannenergy.com>

Subject: Automatic reply: 49 CFR Part 172.328(d)

Thank you for contacting the HAZMAT Info Center (HMIC) within the Pipeline and Hazardous Materials Safety Administration (PHMSA). The HMIC assists with the use of the Hazardous Materials Regulations (HMR), and provides other services as noted on our website (click [here](#)). The information center is staffed Monday through Friday, 9am-5pm EST. This email acknowledges receipt of your inquiry.

To better assist you, we ask that you provide your name, a phone number, and a detailed question or concern. You may respond to this email or contact the HMIC by phone at +1 (800) 467-4922 or +1 (202) 366-4488.

Regards,

HazMat InfoCenter Team

From: [Mitch Rumple](#)
To: [INFOCNTR \(PHMSA\)](#)
Subject: 49 CFR Part 172.328(d)
Date: Saturday, October 19, 2024 11:44:14 AM
Attachments: [Outlook-ksxjyrj1.png](#)

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I am writing to seek clarification on the HMR noted above.

During a roadside inspection by law enforcement a violation of the regulations was issued because the decal, required by the Regulations contained a hyphen between the words shut and off. (shut-off).

Generally, hyphens are used to join two words together. We do not believe the hyphen, in this case, causes confusion or diminishes the effectiveness of the decal.

Best,
Mitch R.

Mitchell J. Rumple
EHS Director



mitchr@mannenergy.com

Mobile: 701-793-3373 Office: 701-842-2884