

25-0081
Cardez

From: Gordon Westbrook <GWestbrook@cityofconroe.org>
Sent: Tuesday, June 10, 2025 12:04 PM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Subject: Letter of Interpretation Request

You don't often get email from gwestbrook@cityofconroe.org. [Learn why this is important](#)

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.

I recently did an inspection on a 331 cargo tank. It was a straight truck transporting LPG. The internal valve was closed, and the hose nozzle was threaded onto the truck. It did have 2 intermediate valves open on the main discharge line, one before and one after the meter. I am getting mixed answers with my local resources on if this is a violation and the regulation says that all valves should be closed during transport. CFR 177.834 (j)(2) General Requirements states that all liquid discharged valves must be closed. Also, CFR 177.840(g) Class2 gasses says all discharge valves need to be closed. There is an old interpretation from 2002 (02-0140) that says that this was not a violation but it specifically sites non-flammable compressed gasses. That interpretation is also a complete contradiction to the two regulations. I called the information center and was advised I was correct to find this as a violation. I am requesting a letter to have this in writing. I also provided pictures. I appreciate all the help I have received.

Regards,

Ofc. Gordon Westbrook
Conroe Police Department

Commercial Vehicle Enforcement

832-247-1014

Ofc. Gordon Westbrook

Conroe PD

2300 Plantation Dr.

Conroe, TX 77303



G.Westbrook (0573)

2025-06-05 09:16:10 -0500
AXON BODY 4 D01A4434R

Manual internal valve- closed

Threaded to truck

Nozzle closed

Viewed by gwestbrook (ConroePDTX.evidence.com) on 06 Jun 2025

G.Westbrook (0573)

2025-06-05 09:17:1
AXON BODY 4 D01A4

Open

Main Discharge Line

Viewed by gwestbrook (ConroePDTX.evidence.com) on 06 Jun 2025

G.Westbrook (0573)

2025-06-05 09:16:34 -0500
AXON BODY 4 D01A4434R



Open

Main Discharge Line

Viewed by gwestbrook (ConroePDTX.evidence.com) on 06 Jun 2025