



NeoWave

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**Larson, R.
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Standards and Rulemaking Division
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Request for Interpretation

To whom it may concern,

I am writing to inquire about the possibility of modifying a cargo tank to a different specification than the one it was originally manufactured under.

Some manufacturers, repair facilities, and registered inspectors operate under the presumption that a cargo tank in the MC 3XX series can have its name plate modified to reflect a current DOT 4XX series, since the cargo tank meets the requirements outlined in §§178.345 through 178.348.

According to §180.405, which addresses the qualification of cargo tanks, paragraph (b) states that a cargo tank originally manufactured to, and I quote, "the MC 306, MC 307, or MC 312 specification may be recertified to the original specification provided" it meets the requirements further outlined in that paragraph.

Additionally, §180.405(c)(2) states that a cargo tank listed in paragraph (c)(1) of the same section may have its pressure relief devices and outlets modified to conform to a newer specification.

So, the following questions arise:

- 1) If a cargo tank complies with all current regulations applicable to the DOT 4XX series, is it permissible to change the specification on the name plate from an MC 3XX series to a DOT 4XX series?
- 2) If the answer to the previous question is no, how should the regulations be interpreted to support the conclusion that the cargo tank cannot be reclassified from its original specification?

I truly appreciate your attention to this matter.

Sincerely,

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