



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

SEP 29 2017

1200 New Jersey Avenue, SE
Washington, DC 20590

Vince Phillips
Maintenance Supervisor
Hazmat Environmental Group
60 Commerce Drive
Buffalo, NY 14218-1040

Reference No. 17-0058

Dear Mr. Phillips:

This letter is in response to your June 1, 2017, letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to inspection requirements for the areas on a cargo tank covered by the upper coupler (fifth wheel). You describe a lined cargo tank transporting lading that is corrosive to the tank but—due to the lining—does not come in direct contact with the tank itself. You ask whether the areas covered by the upper coupler (fifth wheel) must be tested every two years in accordance with § 180.407(d)(2)(ix), even though the tank is lined.

The answer is yes. Section 180.407(d)(2)(ix) requires that when transporting lading corrosive to the tank, areas on a cargo tank covered by the upper coupler (fifth wheel) must be inspected once every two years for corroded and abraded areas, dents, distortions, defects in welds, and any other condition that might render the tank unsafe for transportation service. The lading you describe is corrosive. Therefore, even though the lading does not physically come in contact with the tank, the HMR require that the inspection be completed every two years.

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

Sincerely,

Dirk Der Kinderen
Chief, Standards Development
Standards and Rulemaking Division

Geller
§ 180.407(d)(2)(ix)
Cargo Tanks
17-0058

Office of Hazardous Materials Standards

U.S. Department of Transportation

Please see the below my question regarding an interpretation on the below listed Hazardous Materials Regulations.

180.407(d)(2)(ix) For cargo tanks transporting lading corrosive to the tank, areas covered by the upper coupler (fifth wheel) assembly must be inspected at least once in each two year period for corroded and abraded areas, dents, distortions, defects in welds, and any other condition that might render the tank unsafe for transportation service. The upper coupler (fifth wheel) assembly must be removed from the cargo tank for this inspection.

The part of "For cargo tanks transporting lading corrosive to the tank" is where my question comes in regarding a **lined** cargo tank, although the lading in the tank is corrosive to the tank it does not ever touch the tank as it is lined. Could in this instance the coupler removal then go back to following under 180.407(g)(1)(iii) for 5 year pressure testing criteria. We are asking this under the premise in this case where it is an uninsulated, unjacketed, and the upper coupler (fifth wheel) does not interfere with completing a full external visual inspection of the cargo tank, appurtenances, and structural attachments on this cargo tank.

Thank you. Sincerely,


Vince Phillips

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