



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

APR 02 2018

Stephen Kovacic
Keehn Service Corporation
99 N. 11th Avenue
Coatesville, PA 19320

Reference No. 17-0020

Dear Mr. Kovacic:

This letter is in response to your February 13, 2017, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the marking requirements for a Department of Transportation (DOT) Specification MC 331 cargo tank. Specifically, you ask if § 178.337-9(c) allows the inlet/outlet marking to be placed on guarding, supports, or interlock paddles on an MC 331 cargo tank as it relates to guidance offered in a previously-issued letter of interpretation. You also provide photographs illustrating the placement of your markings on an MC 331 cargo tank motor vehicle.

The answer is yes. In accordance with § 178.337-9(c), each cargo tank inlet and outlet, with the exception of gauging devices, thermometer wells, and pressure relief devices, must be marked "liquid" or "vapor" to designate whether it communicates with liquid or vapor when the cargo tank is filled to the maximum permitted filling density. Provided the marking is readily visible, legible, durable to withstand transport conditions, and clearly associated with the corresponding inlet/outlet, the marking would satisfy the requirements of the HMR.

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

Sincerely,

Shane Kelley
Director
Standards and Rulemaking Division

Dodd, Alice (PHMSA)

Andrews
§ 178.337-9c
Packaging Specs
17-0020

From: INFOCNTR (PHMSA)
Sent: Tuesday, February 14, 2017 5:09 PM
To: Hazmat Interps
Subject: FW: Clarification of Ref. No. 16-0001
Attachments: 20170202_074334.jpg; 20170202_074702.jpg

Hi Shante/Alice,

Please submit this as a letter of interpretation. Please let me know if you have any questions.

Thanks,
Jordan

From: steve [mailto:steve@keehnservice.com]
Sent: Tuesday, February 14, 2017 1:33 PM
To: PHMSA HM InfoCenter <PHMSAHMInfoCenter@dot.gov>
Subject: Fw: Clarification of Ref. No. 16-0001

Please submit this for formal letter of interpretation.

Regards,

Stephen Kovacic
Keehn Service Corp
99 N 11th Ave
Coatesville, PA 19320
610-384-6851
steve@keehnservice.com

-----Original Message-----

From: steve <steve@keehnservice.com>
To: phmsa.hm-infocenter@dot.gov
Date: 02/13/17 08:33
Subject: Clarification of Ref. No. 16-0001

I am requesting a clarification of US DOT Pipeline and Hazardous Materials Safety Administration interpretation No. 16-0001.

The issued interpretation letter states that "The required markings must be on the inlet and outlet equipment itself and in close proximity to its respective make/break connection point, rather than on the cargo tank wall."

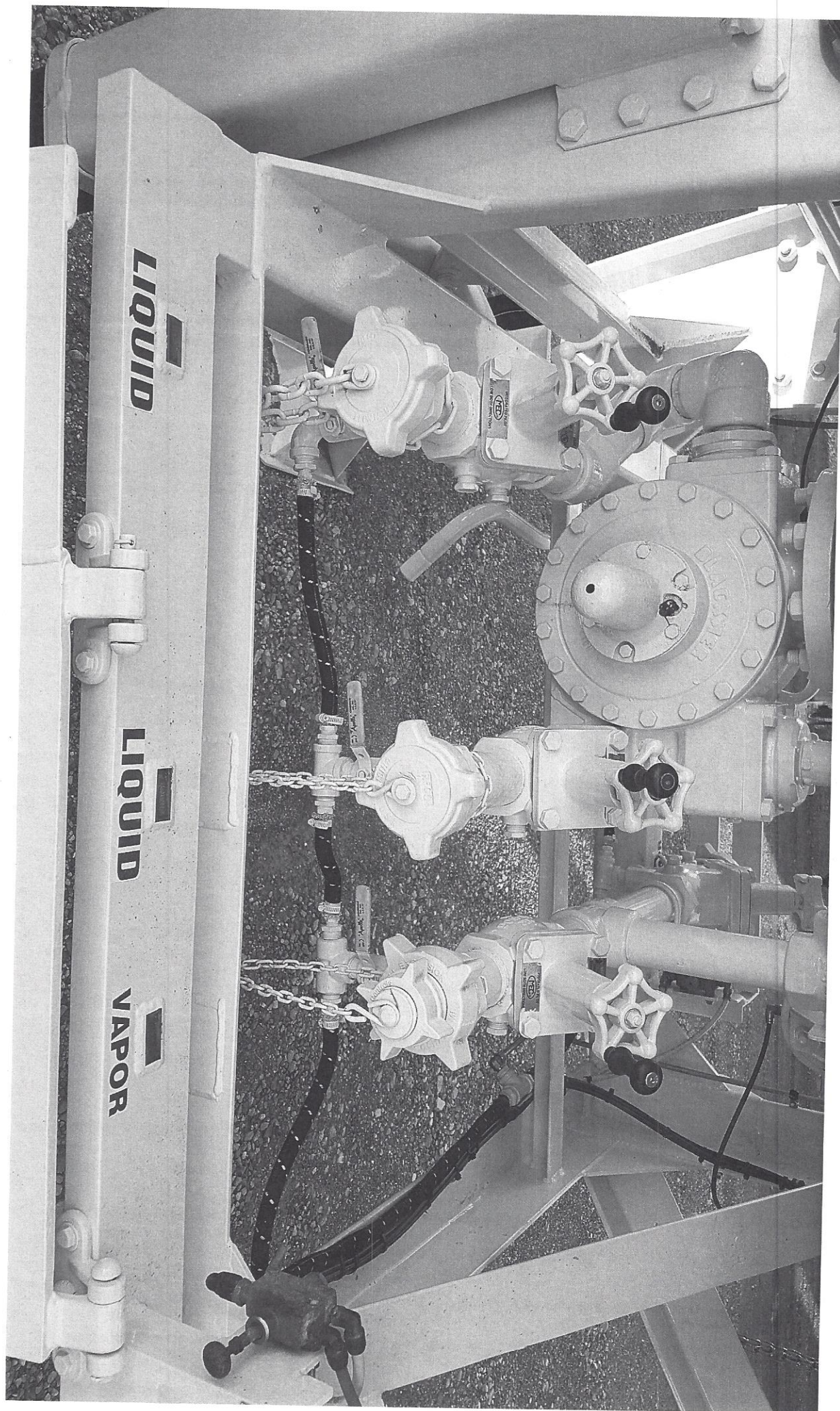
I am requesting that a clarification to the phrase "marking be on the inlet and outlet equipment itself" does not specifically refer to the piping and inlet and outlet valve(s) but the word "equipment" is used in a broader context allowing the markings to be placed on guarding, supports or interlock paddles "in close proximity to its respective make/break connection points".

Most commonly placed as shown in the attached photos.

Thank you for your attention in this matter.

Regards,

Stephen Kovacic
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steve@keehnservice.com



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OF MAXINE

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