



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

SEP 20 2018

Tom Allen
KASI Infrared Corporation
931 John Stark Highway
Newport, NH 03773

Reference No. 18-0086

Dear Mr. Allen:

This letter is in response to your June 6, 2018, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the requirements for permanently mounted propane tanks for which the sole purpose is powering equipment that is mounted on the truck. Specifically, you ask whether the transport vehicle in the photographs provided is subject the placarding requirements of Part 172, Subpart F of the HMR.

The answer is no. Provided the permanently mounted propane tanks meet the requirements of 49 CFR 393.65 and 393.67 of the Federal Motor Carrier Safety Regulations (FMCSR) for fuel systems and are used only for supplying fuel for the operation of the motor vehicle or its auxiliary equipment, the mounted propane tanks are not subject to the HMR with respect to their use on the vehicle.

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

Sincerely,

Dirk Der Kinderen
Chief, Standards Development Branch
Standards and Rulemaking Division

Ciccone
Placarding
18-0086

January, Ikeya CTR (PHMSA)

From: DerKinderen, Dirk (PHMSA)
Sent: Thursday, June 07, 2018 4:13 PM
To: January, Ikeya CTR (PHMSA)
Cc: Geller, Shelby (PHMSA)
Subject: FW: Request for Clarification

Ikeya,

Please enter in Filemaker as an interp request and please reach out to Mr. Allen for the photos that he refers to in the text of his email. I don't see the attached photos.

Sincerely,

Dirk Der Kinderen

From: Raynor, T'Mia (PHMSA)
Sent: Thursday, June 07, 2018 4:10 PM
To: DerKinderen, Dirk (PHMSA) <Dirk.DerKinderen@dot.gov>
Subject: FW: Request for Clarification

Hello,

This was received in the webmaster inbox.

Thanks,

T'Mia Raynor
Webmaster
PHMSA Office of the CIO (PHF-30)
Desk: (202) 366-9818 | Mobile: (202) 580-9447

From: Tom Allen <tom@kasiinfrared.com>
Sent: Thursday, June 7, 2018 3:34:16 PM
To: PHMSA Webmaster
Subject: Request for Clarification

JUNE 6, 2018

TO: Office of Hazmat Standards
Dirk Der Kinderen
East Building
1200 N.J. Avenue SE
Washington, DC 20590

FROM: Tom Allen

General Manager
KASI Infrared Corporation
931 John Stark Highway
Newport, NH 03773

SUBJECT: Request for determination of placarding

We have periodically been asked by customers if placarding and hazmat certification was required on this equipment. In each instance we called you folks and were told that as long as the fuel tanks meet FMCSA 49 CFR 393.65 and.67 regulation as the fit for this equipment and that the tanks were permanently mounted and for the sole purpose of powering the truck mounted equipment that no placarding was required. The key points we were referred to were that this is a permanently mounted system with permanently affixed tanks and the propane vapor was utilized solely for the operation of the system. We have two tank configurations depending on the amount of fuel necessary for operation of the systems. The smaller systems carry five 100 LB DOT Multi-Valve LPG Vapor Draw Tanks and the larger systems carry two 420 LB DOT Multi-Valve LPG Vapor Draw Tanks. We would like to have an interpretation to make certain we are Correct regarding placarding.

I have attached photos of the systems referred to above

Thank you



