

INTERPRETATION LETTERS

Requester	John Freiler	Date Received:	10/9/2018
Company	Truck Trailer Manufacturers Association	Tracking	18-0125
Phone	703-549-3010	Revision Date:	10/9/2018
Date Assigned	10/09/2018	Date of Letter	10/05/2018
Staff	Wolcott	First Draft Due:	10/30/2018
Section		First Draft Date:	
Subject			
Concurrence			
Status	PHH-10-Specialist	Status Date	10/9/2018
Sign Date		Signor	
Comment	HBP <input type="checkbox"/>	Copy to Docket <input type="checkbox"/>	Copy to DHM-60 <input type="checkbox"/>

January, Ikeya CTR (PHMSA)

From: Foster, Glenn (PHMSA)
Sent: Tuesday, October 09, 2018 1:23 PM
To: Dodd, Alice (PHMSA); January, Ikeya CTR (PHMSA)
Subject: Fwd: Request for Interpretation - MC-331 Shear Sections
Attachments: TTMA Request for Interpretation - MC331 Shear Sections.pdf

Incoming Interp.

T. Glenn Foster
Chief, Regulatory Review and Reinvention
Standards and Rulemaking Division
Office of Hazardous Materials Safety
Pipeline and Hazardous Materials Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue, S.E.
Washington, DC 20590
202-366-4453
glenn.foster@dot.gov

From: John Freiler <john@trucktrailer.org>
Sent: Friday, October 5, 2018 2:21:42 PM
To: PHMSA HM InfoCenter
Cc: PHMSA Petitions; Carrie Renuart; Jeff Sims
Subject: Request for Interpretation - MC-331 Shear Sections

Please see the attached request for Interpretation regarding shear sections on MC-331 cargo tanks.

Thanks!

John Freiler - Engineering Manager



Truck Trailer Manufacturers Association

7001 Heritage Village Plaza

Suite 220

Gainesville, VA 20155-3094

703-549-3010 - Phone



Tank Conference

Jeffrey M. Sims • President

7001 Heritage Village Plaza • Suite 220 • Gainesville, VA 20155 • 703-549-3010

October 5, 2018

U.S.DOT
PHMSA-Office of Hazardous Materials Standards
Attn: PHH-10
East Building
1200 New Jersey Ave, SE
Washington, DC 20590

Phmsa.hm-infocenter@dot.gov

Subject: Request for Interpretation – MC331 Shear Sections

Dear Sirs,

We are requesting formal interpretation of the HMR requirements for shear sections on valves installed on MC-331 Cargo tanks.

49CFR 178.337-10(f) requires a shear section for valves specified in subparagraphs (1) and (2) of paragraph (f). These valves are typically located on the bottom exterior of the tank, and the accident damage protection in 178.337-10 is also typically located on the bottom exterior of the tank. Does 49CFR 178.337-10(f) apply to valves located within a recessed well that meets accident damage protection requirements on top of an MC-331 Cargo Tank? May a ball valve without a shear section be used for liquid and vapor connections within a recessed well on top of an MC-331 Cargo Tank provided all other requirements are met?

If you have any questions at all, please feel free to contact me.

Sincerely,

John Freiler

John Freiler
Engineering Manager

Cc PHMSAPetitions@dot.gov



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

APR 16 2019

John Freiler
Truck Trailer Manufacturers Association
7001 Heritage Village Plaza, Suite 220
Gainesville, VA 20155

Reference No. 18-0125

Dear Mr. Freiler:

This letter is in response to your October 5, 2018, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the design of MC-331 cargo tanks. Specifically, you ask about the requirements for shear sections on valves.

We have paraphrased and answered your questions as follows:

- Q1. You ask if § 178.337-10(f) applies to valves located within a recessed well that meet the accident damage protection requirements on top of an MC-331 cargo tank.
- A1. The answer is yes. Section 178.337-10(f) still applies to valves located on the top of an MC-331 cargo tank that meet the requirements for accident damage protection.
- Q2. You ask if a ball valve without a shear section may be used for liquid and vapor connections within a recessed well on top of an MC-331 cargo tank.
- A2. The answer is no. A shear section is still required. The ball valve and recessed well do not except the cargo tank from the requirements for shear sections on valves.

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

Sincerely,

T. Glenn Foster
Chief, Regulatory Review and Reinvention
Standards and Rulemaking Division