



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, DC 20590

February 8, 2021

Tom Forbes  
Public Utilities Commission of Ohio  
Transportation Department  
180 East Broad St, 4th floor  
Columbus, OH 43215

Reference No. 20-0092

Dear Mr. Forbes:

This letter is in response to your November 30, 2020, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to a vinyl wrapped cargo tank motor vehicle (CTMV). Specifically, you ask about the inspection requirements pertaining to a Specification MC-331 CTMV (i.e., a bobtail metered delivery truck) that is fitted with a vinyl wrap covering significant portions of the sides of the cargo tank, thus precluding the performance of external visual inspections as required in § 180.407. You also state that the CTMV is not equipped with a manhole to allow for an internal visual inspection, as is required when external visual inspections are not practicable. Finally, you ask whether an annual pressure test (e.g., hydrostatic or pneumatic) is required in lieu of an external visual inspection when neither an external—or substitute internal—visual inspection is possible.

The answer is yes. As required by § 180.407(c), an inspector must complete the external visual inspection annually, except for on a cargo tank designed to be loaded by vacuum with full opening rear heads. If the external visual inspection is prevented because any part of the cargo tank wall is externally lined, coated, or otherwise designed to prevent an external visual inspection, those areas of the cargo tank must be internally inspected. If the internal visual inspection is prevented because the cargo tank is lined, coated, or otherwise designed to prevent access for internal visual inspection, the cargo tank must be hydrostatically or pneumatically tested in accordance with § 180.407(g)(1)(iv) (see § 180.407(d)(1)). Therefore, the bobtail metered delivery truck you described must be annually pressure tested because the vinyl wrap prevents a complete external visual inspection, and the lack of a manhole prevents an internal visual inspection.

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

Casey

20-0092

**From:** [INFOCNTR \(PHMSA\)](#)  
**To:** [Dodd, Alice \(PHMSA\)](#); [Hazmat Interps](#)  
**Subject:** FW: Interpretation Request  
**Date:** Tuesday, December 1, 2020 11:27:50 AM  
**Attachments:** [image003.png](#)  
[image004.png](#)

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Hi Alice,

Please see the letter of interpretation request below. The requestor's address is:  
180 East Broad St 4th floor  
Columbus, OH 43215.

Please contact our office with any questions.

Best,

Sarah (HMIC)

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**From:** tom.forbes@puco.ohio.gov [mailto:tom.forbes@puco.ohio.gov]  
**Sent:** Monday, November 30, 2020 2:49 PM  
**To:** INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>  
**Subject:** Interpretation Request

**CAUTION:** This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

This email is requesting written clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171--180) applicable to the test and inspection requirements of cargo tanks covered with a vinyl wrap for advertisement purposes. I have reviewed previous interpretation on this matter including 16-0049, 14-0110 and 15-0221.

In this situation a MC-331 bobtail metered deliver truck is fitted with a vinyl wrap that covers major portions of both sides of the cargo tank. This vinyl wrap prevents a complete external visual inspection of the cargo tanks sides. It is my understanding that these portions of the cargo tank would then require an internal visual inspection of those areas annually as required by 180.407(d) (1). This particular MC-331 cargo tank is not equipped with a manhole to allow internal inspection. If the cargo tank is designed to prevent an internal visual inspection, is it correct to state an annual pressure test would be required on this unit?

Thank you for your assistance and guidance on this matter.

Tom Forbes  
Public Utilities Commission of Ohio  
Transportation Department

Assistant Chief Motor Carrier & Rail Enforcement Division

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[PUCO.ohio.gov](http://PUCO.ohio.gov)



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