



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

April 13, 2021

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

Reference No. 21-0007

Dear Mr. Freiler:

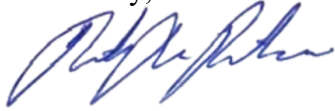
This letter is in response to your January 27, 2021, letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the requirements for installing lightweight attachments to a cargo tank motor vehicle. Specifically, you ask about the requirements in § 178.345-3(f)(2) and whether the term “lightweight attachment” is limited exclusively to a conduit clip, brake line clip, skirting structure, lamp mounting bracket, or placard holder.

The answer is no. In accordance with § 178.345-3(f)(2), a “lightweight attachment” to a cargo tank wall such as a conduit clip, brake line clip, skirting structure, lamp mounting bracket, or placard holder must be of a construction having lesser strength than the cargo tank wall materials and may not be more than 72 percent of the thickness of the material to which it is attached. The words “such as” used in § 178.345-3(f)(2) denotes that a conduit clip, brake line clip, skirting structure, lamp mounting bracket, and placard holder are all examples of a lightweight attachment.

The examples are not an exhaustive list; however, these types of items are constructed to have lesser strength than the cargo tank wall materials and be not more than 72 percent of the thickness of the material to which it is attached.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Dirk Der Kinderen". The signature is fluid and cursive, with a large initial "D".

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

From: [INFOCNTR \(PHMSA\)](#)
To: [Dodd, Alice \(PHMSA\)](#); [Hazmat Interps](#)
Subject: FW: TTMA Request for interpretation on Appurtenances on Cargo Tanks
Date: Friday, January 29, 2021 11:24:30 AM
Attachments: [TTMA RFI - PHMSA Appurtenances - Final.pdf](#)

Dear Alice,

Please see the attached request for a letter of interpretation. Please contact our office with any questions.

Thank you,

Sarah (HMIC)

From: John Freiler [mailto:John@trucktrailer.org]
Sent: Wednesday, January 27, 2021 2:35 PM
To: PHMSA HM InfoCenter <PHMSAHMInfoCenter@dot.gov>
Cc: PHMSAPetions@dot.gov; Carrie Renuart <carrie@trucktrailer.org>; Jeff Sims <jeff@trucktrailer.org>; Michael Stevens <michael.stevens@dot.gov>
Subject: TTMA Request for interpretation on Appurtenances on Cargo Tanks

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.

Hello,

Please see the attached letter requesting an interpretation on appurtenances on cargo tanks.

Thank you.

John Freiler - Engineering Manager

Truck Trailer Manufacturers Association
7001 Heritage Village Plaza
Suite 220
Gainesville, VA 20155-3094

703-549-3010 - Phone