



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

1200 New Jersey Avenue, SE  
Washington, DC 20590

May 7, 2021

Darren Amman  
McCallum Rock Drilling  
123 Habein Road  
Chehalis, WA 98532

Reference No. 21-0028

Dear Mr. Amman:

This letter is in response to your March 12, 2021, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to a cargo tank nameplate. You explain that McCallum Rock Drilling has three non-DOT specification cargo tanks that are used to transport “UN3375, Ammonium nitrate emulsion *or* Ammonium nitrate suspension *or* Ammonium nitrate gel, *intermediate for blasting explosives*, 5.1, PG II.” You further explain that operations at the company were halted due to not having the correct nameplate on the cargo tanks. Additionally, you provided a photograph of the new nameplate that would be attached to the cargo tanks and you ask whether the information on the new nameplate meets the requirements of the HMR and the Institute of Makers of Explosives Safety Library Publication No. 23 (IME SLP-23), which is incorporated by reference in § 171.7 and authorized for use in § 173.66.

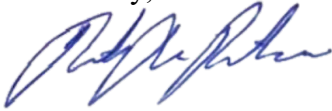
In accordance with IME SLP-23 Section I, (F)(3)(a), the manufacturer of non-DOT specification cargo tanks shall certify that each packaging is designed, constructed, and tested in accordance with the applicable standards of IME SLP-23. Also, in accordance with IME SLP-23 Section I, (F)(3)(d), a non-DOT specification cargo tank must include specific information on the nameplate. Based on the photograph you provided, the nameplate appears to be missing the following information:

- Indication of whether the cargo tank is designed for either liquid or solid
- Name and address of manufacturer
- Maximum allowable working pressure
- Maximum design pressure
- Maximum lading temperature
- Maximum weight of lading in pounds

If McCallum Rock Drilling addresses the missing information and all other applicable HMR and IME SLP-23 requirements are met, the new nameplate would be in compliance.

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 prominent initial "D".

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

**From:** [INFOCNTR \(PHMSA\)](#)  
**To:** [Hazmat Interps](#)  
**Subject:** FW: Letter of interpretation  
**Date:** Tuesday, March 16, 2021 3:43:11 PM

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Hello Alice,

Please see the below Interpretation request. Please let us know if you need anything from us.

Regards,

-Breanna

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**From:** Amman, Darren [mailto:darrena@mccallumrock.com]  
**Sent:** Friday, March 12, 2021 3:38 PM  
**To:** INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>  
**Subject:** Letter of interpretation

**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.

We have 3 NON spec tanks that we are using to haul UN3375. We have been shut down due to not having the correct tag on the tank. Is this all that we need to have on the tag? It meets or exceeds all of these specs.

1. Motor vehicles, cargo tanks, portable tanks and other approved bulk packagings shall be marked and placarded in accordance with 49 CFR §172, Subparts D and F.
2. Each bulk packaging authorized by this standard shall be plainly marked on its head or near the specification plate in English, "IME SLP-23" with letters and numbers at least 5 cm (2 inches) high on a contrasting background.
3. Additional markings for non-specification bulk packagings:
  - a. The manufacturer of non-DOT specification cargo tanks, portable tanks, sift-proof closed vehicles and closed bulk bins shall certify that each packaging is designed, constructed and tested in accordance with the applicable standards of IME SLP-23.
  - b. The non-DOT specification bulk packagings shall be marked with a corrosion resistant metal nameplate. The nameplate shall be permanently located:
    - 1) Near the front on cargo tanks, or closed sift-proof bins; or
    - 2) Near the discharge valve on portable tanks and portable closed bulk bins.
  - c. The nameplate shall be visible for inspection.
  - d. The nameplate shall include the following:
    - 1) Designed for liquid \_\_\_ or solid \_\_\_
    - 2) Date of manufacture \_\_\_\_\_
    - 3) Name and address of manufacturer

- 4) Materials of construction
  - i. type of material
- 5) Maximum allowable working pressure
- 6) Maximum design pressure
- 7) Maximum lading temperature
- 8) Capacity in gallons or pounds
- 9) Maximum weight of lading in pounds

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**Darren Amman**

Lead Mechanic

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[www.mccallumrock.com](http://www.mccallumrock.com)

