



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, DC 20590

**MAR 30 2018**

Anthony Wurl  
Director of Engineering  
STE  
801 4th Street  
Beloit, WI 53511

Reference No. 17-0091

Dear Mr. Wurl:

This letter is in response to your August 22, 2017, email and subsequent phone calls requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the American Society of Mechanical Engineers (ASME) nameplate marking requirements in § 178.345-14 for a Department of Transportation (DOT) 406, DOT 407, or DOT 412 specification cargo tank. You include in your email photographs of three plates on a cargo tank, each with a different set of markings:

- The first plate includes the information required in § 178.345-14(c) for a DOT specification plate.
- The second plate is located near the first plate and marked with the minimum information required in § 178.345-14(b) for an ASME nameplate.
- The third plate repeats some, but not all, of the § 178.345-14(b) required markings for an ASME nameplate in a separate location on the cargo tank. It also shows additional information required in UG-119 of the ASME Code.

Specifically, you ask whether the HMR require this voluntary, additional ASME nameplate to be in close proximity to the required markings on the other ASME nameplate and the DOT specification plate.

Section 178.345-14(a) requires cargo tanks certified after October 1, 2004, to be marked with a corrosion-resistant metal nameplate (ASME nameplate); and each cargo tank motor vehicle certified after October 1, 2004, must have a specification plate that is permanently attached to the cargo tank by brazing, welding, or other suitable means on the left side near the front in a place

accessible for inspection. The information required by the marking requirements is further specified in § 178.345-14(b) and (c). The HMR do not prohibit the use of additional markings or specify a location for their placement.

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

Sincerely,

A handwritten signature in black ink, reading "T. Glenn Foster". The signature is written in a cursive style with a long horizontal flourish extending to the right.

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

NEWMAN  
§ 178-345-14  
Packaging Specs  
17-0091

**Dodd, Alice (PHMSA)**

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**From:** INFOCNTR (PHMSA)  
**Sent:** Wednesday, August 23, 2017 12:52 PM  
**To:** Hazmat Interps  
**Subject:** FW: Request of Letter of Interpretation

Hi Alice,

Below is a request for a letter of interpretation. Mr. Wurl spoke with Breanna regarding this question. Please let me know if you have any questions.

Thanks,  
Jodi

**From:** Anthony Wurl [mailto:awurl@stainlessstanker.com]  
**Sent:** Tuesday, August 22, 2017 5:02 PM  
**To:** INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>  
**Subject:** Request of Letter of Interpretation

To whom this may concern,

I am following up per a conversation I had with someone recently at the Information Center regarding the ASME plate installation on the 407,412 Code Units.

Per 49 CFR 178.345-14, there isn't a description of a location regarding the ASME name plate defined in Section VIII UG-119. This is an additional plate for the pressure vessel outside of the DOT required plates defined in (b), (c),(d), and (e) of 49 CFR 178.345-14. My question was does this ASME name plate need to be near the DOT plates defined or not. My contact at the Information Center followed up this afternoon that it did not, however to follow Section VIII's guidance in UG-119.

I am formally requesting a Letter of Interpretation to be published by the Information Center. My information is below:

**Name:** Anthony Wurl  
**e-mail:** [awurl@stainlessstanker.com](mailto:awurl@stainlessstanker.com)  
**Phone:** 608-313-8042  
**Address:** 801 4th Street, Beloit, WI 53511

Thank you

**Anthony Wurl**  
Director of Engineering



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