



U.S. Department  
of Transportation

**Research and  
Special Programs  
Administration**

400 Seventh Street, S.W.  
Washington, D.C. 20590

JUL 22 1998

Mr. William J. Schuchman  
MMA  
10733 Big Bend Blvd.  
St. Louis, MO 63122-6027

Ref. No. 98-0207

Dear Mr. Schuchman:

This is in response to your letter regarding requirements for compartmented cargo tank motor vehicles under the Hazardous Materials Regulations (HMR; 49 CFR 171-180). Specifically, you asked if a damaged or otherwise unusable compartment of a cargo tank motor vehicle precludes the use of the remaining compartments in a cargo tank transporting liquids. I apologize for the delay in responding and hope it has not caused any inconvenience.

Whether a cargo tank motor vehicle composed of one or more cargo tanks can remain in service with a single damaged or otherwise unusable cargo tank depends upon the design of the cargo tank and the structural integrity of the cargo tank motor vehicle. Provided the cargo tank motor vehicle's cargo tanks are designed as single, separate cargo tanks and the cargo tank motor vehicle's structural integrity has not been compromised and otherwise meets applicable requirements of Part 180, the undamaged sections of the cargo tank motor vehicle may remain in use in hazardous materials service.

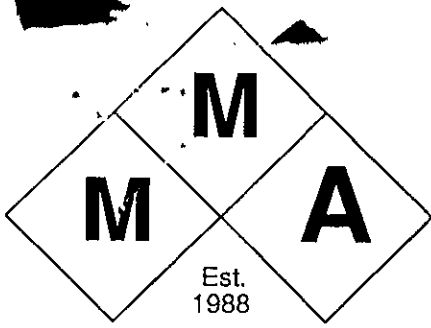
If the damaged cargo tank would weaken the structural integrity of the cargo tank motor vehicle, the vehicle would not meet the requirements of Part 180 and could not remain in use in hazardous materials service (see § 180.405(j)). A DOT or MC specification cargo tank motor vehicle that for any reason does not comply with the applicable specification may not be used to transport hazardous materials unless it is repaired, tested and inspected as required by §§ 180.407(b) and 180.413(b).

I hope this information is helpful. If we can be of further assistance, please contact us.

Sincerely,

Delmer F. Billings  
Chief, Regulations Development  
Office of Hazardous Materials Standards

171.2



File 171.2  
SC: 333 355



AN ENVIRONMENTAL & SAFETY/HEALTH COOPERATIVE

*Services*

May 30, 1997

98-0207

- \*AIR PERMITS
- \*AIR POLLUTION
- \*ANALYTICAL TESTING
- \*ASBESTOS
- \*ASSESSMENTS
- \*AUDITS
- \*BIOREMEDIATION
- \*BULK DISPOSAL
- \*CITY/COUNTY EOP
- \*COMPLIANCE PROGRAMS
- \*CORRECTIVE ACTION PLANS
- \*DESIGN
- \*DISASTER PLANNING
- \*EIQ REPORTING
- \*EMERGENCY PLANS
- \*EMERGENCY RESPONSE
- \*EMISSION MONITORING
- \*EMPLOYEE TRAINING
- \*ENGINEERING
- \*ENVIRONMENTAL SAMPLING
- \*ENVIRONMENTAL TESTING
- \*FIRE PREVENTION
- \*FREE INFORMATION HOTLINE
- \*FREE OSHA/RCRA WALK THROUGH
- \*HAZ WASTE MGT/ DISPOSAL
- \*INDUSTRIAL HYGIENE
- \*INVESTIGATION
- \*LAB PACKS
- \*LAB SERVICES
- \*LAND FARMING
- \*LEAKING TANK MGT (LUST MGT)
- \*LIAISON
- \*NEWSLETTER
- \*OSHA MEDIATION
- \*OSHA PROGRAMS
- \*PERMITS
- \*PHASE I
- \*PHASE II
- \*PROJECT DESIGNS
- \*PUBLIC RELATIONS
- \*SAFETY PROGRAMS
- \*SARA III/FORM R/ TIER II
- \*SITE CHARACTERIZATION
- \*SOLID WASTE MGT
- \*SPCCP
- \*SPECIAL WASTE MGT/ DISPOSAL
- \*SPILL CONTROL
- \*STORM WATER COMPLIANCE
- \*TECHNOLOGY UPGRADES
- \*TIER II
- \*TRAINER PROGRAMS
- \*24 HR. EMERGENCY RESPONSE HOTLINE
- \*UST MGT
- \*UST TANK CLOSURES
- \*VIOLATION MEDIATION
- \*WASTE MINIMIZATION
- \*WASTEWATER SAMPLING

Mr. Delmer F. Billings  
Chief, Regulations Development  
US DOT  
Office of Hazardous Materials Standards  
400 Seventh Street, S.W.  
Washington, D.C. 20590

Dear Mr. Billings:

We would like to direct a recent question from a MMA member company to your attention.

The question regards the functionality of a multiple compartment liquid bulk hauling tank trailer.

Does a damaged or otherwise not usable single tank trailer compartment preclude the use of the remaining trailer compartments in the transportation of bulk liquids?

We would appreciate your attention and response in this matter. Thank you.

Sincerely,

William J. Schuchman MSSE, REM, REPA  
Executive Director