



U.S. Department  
of Transportation

**Research and  
Special Programs  
Administration**

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

MAY 8 1998

Mr. Al Chatillon, P. Eng.  
TANKCON  
4250 Marcel Lacasse,  
Boisbriand, Que. J7H 1N3

Dear Mr. Chatillon:

This is in response to your letter concerning the location of pressure relief devices specified in 49 CFR 178.345-10(c). You state that your understanding is that a cargo tank designed with all inlets/outlets in the rear, but with the pressure relief vent in the top of the manhole cover, would comply with § 178.345-10(c) even if the vent is not in the center of the tank.

Section 178.345-10(c) provides specific requirements for the location of relief devices and several examples on where relief can be located. It states "Each pressure relief device must communicate with the vapor space above the lading as near as practicable to the center of the vapor space." This requirement applies regardless of vehicle orientation. Therefore, the configuration you suggest would not meet the requirements of the Hazardous Materials Regulations unless the manhole cover is located as near practicable to the center of the vapor space.

If you need further assistance, please contact us.

Sincerely,

Thomas G. Allan  
Senior Transportation Regulations Specialists  
Office of Hazardous Materials Standards



*Karim  
File: 178.345-10*

February 24th, 1998

Office of Hazardous Materials Standards  
U.S. Department of Transport  
Washington, DC.  
20590

Attention: Mr. E. Mazzullo,

Interpretation of 178.345-10 c) Location of relief devices

Following my conversation with Mr. P. Olsen concerning an interpretation of Section 178.345-10 c) you will find here in our understanding, could please confirm this position.

per section 178.345-10 c) the pressure relief device must be in contact with the vapor space and as close as practicable to top of the tank.

Question: If the tank is designed with all the inlets/outlets in the rear and the vent is located in the top of the manhole cover, the air relief device will always be in contact with the vapor space and consequently this location would comply with section 178.345-10 c) even if it is not located in the centre of the tank.

Do you agree with the above statement? If so please confirm for files.

We thank you in advance for your cooperation.

Yours Truly,

*En. Chatillon*  
Al. Chatillon, P.Eng.