



U.S. Department  
of Transportation

**Research and  
Special Programs  
Administration**

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

APR 20 1998

Mr. John Freiler  
Engineering Manager  
Girard Equipment, Inc.  
1004 Route 1  
Rahway, NJ 07065

Dear Mr. Freiler:

This is in response to your letter requesting clarification of the venting requirements for DOT 407 and DOT 412 tanks under the Hazardous Materials Regulations (HMR: 49 CFR Parts 171-180). Your questions are paraphrased and answered below:

- Q1. Does the HMR require American Society Mechanical Engineers (ASME) "V" stamped pressure relief devices on DOT 407 or DOT 412 cargo tank motor vehicles?
- A1. The answer is no. The intent of the HMR is not to require ASME "V" stamped pressure relief devices on DOT 407 or DOT 412 cargo tanks. The provisions specified in § 178.345-10 are the applicable requirements for pressure relief devices used on a DOT 407 or DOT 412 cargo tank. These provisions do not preclude use of pressure relief devices certified to the ASME.
- Q2. Does the HMR require an ASME pressure relief device in addition to the devices specified in 178.345-10?
- A2. The answer is no. Section 178.345-10 does not require the use of an ASME "V" stamped pressure relief device in addition to the devices specified in the HMR.

I hope this information is helpful. Please contact this office if you require additional assistance.

Sincerely,

Hattie L. Mitchell, Chief  
Regulatory Review and Reinvention  
Office of Hazardous Materials Standards

# GIRARD EQUIPMENT INC.

D.O.T. REGISTERED TANK COMPONENT MANUFACTURER REG. NO. CT-0035.

1004 ROUTE 1, RAHWAY, NEW JERSEY 07065 P.O. BOX 302-B  
732-382-4600 • FAX 732-382-4650 • WATTS 1-800-526-4330

Post on  
710:178 347  
SC:321

November 13, 1997

Office of Hazardous Materials Standards  
Edward Mazzullo  
DHM-10  
Research and Special Programs Administration  
U.S. Department of Transportation  
400 Seventh St. S.W.  
Washington DC 20590

DOT-407 = 35 PSI or  
greater

Dear Mr. Mazzullo;

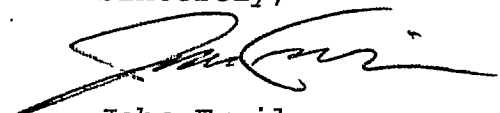
The following is a request for interpretation of 49CFR §178.347-1(d) and §178.348-1(e) as it applies to venting requirements for DOT-407 and DOT-412 tanks.

Does the code require ASME "V" stamped pressure relief valves for either DOT-407 or DOT-412 tanks? No (178.345-10 (b) must be met)

At the public meeting held on March 24 & 25, 1993 with RSPA in the FAA building in Des Plains, Illinois, it was indicated verbally by Alan I. Roberts, at that time Associate Administrator for the Office of Hazardous Material Safety, that it was not the intent of the DOT code to require ASME-type venting and further more that the requirements of the DOT code superseded the requirements of the ASME code when it comes to tank truck venting. However, it remains unclear if the DOT code requires an ASME vent in addition to the DOT venting. It does not again must meet 178.345-10

If you have any questions regarding this request for interpretation, please feel free to call or write me at the above address.

Sincerely,



John Freiler  
Engineering Manager  
GIRARD EQUIPMENT, INC.

ASME - certified

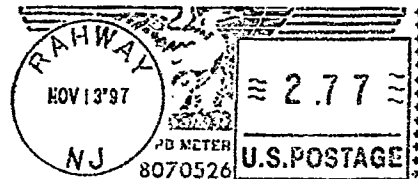
vs

ASME - conformance

178.345-1

# Girard Equipment Inc.

D.O.T. REGISTERED TANK COMPONENT MFG. ■ REG. NO. CT-0035  
P.O. Box 302-B, 1004 Route 1, Rahway, NJ 07065



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