



U.S. Department  
of Transportation

Research and  
Special Programs  
Administration

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

JUL 12 1999

Mr. John R. Perkins  
Perkins Propane Gas, Inc.  
Route 11  
North Shapleigh, Maine 04060

Ref. No: 99-0155

Dear Mr. Perkins:

This is in response to your letter of June 21, 1999, requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) as they pertain to cargo tanks used to transport propane. Specifically you ask whether the main internal valve located in the liquid outage port of a cargo tank and the delivery hose end valve must both be in the closed position during transportation. In addition, you would like confirmation that the closure of any additional valves, such as isolation valves, is not required.

As provided by § 177.834(j) all valves and other closures in liquid discharge systems must be closed and free of leaks. This means each discharge valve in a liquid discharge system must be closed during transportation. This requirement does not pertain to any intermediate isolation valves that may be present in a liquid discharge system. Therefore, in your scenario the main internal valve and the delivery hose end valve must be closed. However you are not required to close any other valves in the system.

I hope this information is helpful.

Sincerely,

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



990155

177.834

JUN-21-99 09:43 AM PERRINSON RE: HME

# PERKINS PROPANE GAS, INC.

COMPLETE LP-GAS SERVICE  
ROUTE 11 NORTH SHAPLEIGH, MAINE 04060  
(207) 793-2269

Calville  
8177.834

June 21, 1999

99-0155

Mr. Edward Mazzullo, Director  
Office of Hazardous Material Standards

Dear Mr. Mazzullo,

I am writing to request an interpretation of section 177.834 j as it appears in the 49CFR regulations. As it relates to propane delivery trucks, commonly referred to as Bobtails, it is our understanding that the intent of this standard is that during transit the main internal valve located in the liquid outage port of the cargo tank and the delivery hose end valve both in the closed position would conform to the regulation. The closure of any additional valves located in the liquid discharge system to allow for equipment isolation, such as the meter and delivery hose, is not required.

Thank you for taking the time to clarify this regulation. I look forward to your response.

Sincerely,



John R. Perkins