



U.S. Department  
of Transportation

**Research and  
Special Programs  
Administration**

DEC 22 1999

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

Ms. Carleen A. Ahrens  
Level Propane  
Rootstown Office  
Post Office Box 226  
Rootstown, OH 44272

Ref. No. 99-0262

Dear Ms. Ahrens:

This is in response to your letter dated October 26, 1999, and subsequent phone conversations with Mr. Michael Johnsen of my staff concerning placarding requirements for your propane storage tanks under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180).

Propane storage tanks must be placarded on each side and each end as required in § 172.514. However, § 172.514(c) provides an exception which allows labeling instead of placarding for certain portable tanks, DOT 106 and 110 multi-unit tank cars, IBCs and bulk packagings with a volumetric capacity of less than 18 cubic meters (640 cubic feet). Your tank is a bulk packaging which has a volumetric capacity of less than 18 cubic meters, thus eligible for this exception.

I hope this satisfies your request.

Sincerely,

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



990262

172.514



Rootstown Office  
P. O. Box 226  
Rootstown, OH 44272

1-800-6LEVEL1  
1-330-325-8444  
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October 26, 1999

Department of Transportation  
Office of Hazardous Material & Safety  
Attn: Mike Johnsen  
400 7<sup>th</sup> Street, SW  
Washington, DC 20590

Dear Mr. Johnsen,

Currently you have been working with us regarding placards vs. labeling requirements. Attached you will find our first letter of communication to your office for your reference.

Per our telephone conversation, we have forwarded pictures of our service truck loaded with our tanks in question.

Please call Ron LeMaster or myself at 800-653-8351 ext. 200, with any questions you may have.

Thank you for your time in this matter.

Sincerely,

A handwritten signature in cursive script that reads "Carleen A. Ahrens".

Carleen A. Ahrens  
Transportation Department

Enclosures

Propane and equipment for residential,  
commercial, agriculture  
and construction