



U.S. Department  
of Transportation  
**Research and  
Special Programs  
Administration**

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

SEP 25 2000

Mr. Al Snelling  
Samson Tug and Barge Company, Inc.  
P.O. Box 559  
Sitka, Alaska 99835

Ref. No: 00-0181

Dear Mr. Snelling:

This is in response to your letter of June 13, 2000, requesting information concerning the transport of propane in an MC-330 / MC 331 cargo tank on a barge under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Your questions are paraphrased and answered as follows:

Q1. May propane be transported on a deck cargo barge in an MC 330/331 cargo tank either on a CFC cargo platform or in a roll on - roll off (ro-ro) fashion?

With respect to ro-ro transport, § 176.76(b) requires transport vehicles containing hazardous materials to be carried only on trailership, trainship, ferry vessel or carfloat as those terms are defined in the HMR (refer to § 171.8 for definitions). Depending on the type of service (route) in which it is engaged, a deck cargo barge suitable for that type of service could transport an MC 330/331 cargo tank as ro-ro cargo.

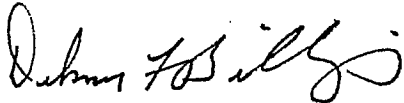
We assume that your reference to CFC platform was meant to be a reference to a container frame or flatrack that meets the provisions of the International Convention for Safe Containers (CSC Convention). An MC 330/331 cargo tank that is adequately secured on a container such as a flatrack that meets the provisions of 49 CFR 450 to 453 may also be transported on a deck cargo barge provided the barge is suitable for the type of service (route) in which it is engaged. Note that if the cargo tank is altered such that it no longer meets the definition of "cargo tank" (e.g., by removal of the pressure vessel portion of the cargo tank from the vehicle or trailer chassis), the foregoing does not apply. In a situation such as this where the pressure vessel is removed from its trailer chassis it would cease to meet the definition of a cargo tank and could only be used if authorized under a DOT exemption or remanufactured to an authorized DOT specification.

Q2. May propane be carried on a deck cargo barge in any fashion other than in a DOT 51 portable tank?

In addition to the manner discussed in the answer to question 1 above, propane also may be transported in certain non-bulk packagings (DOT specification cylinders) in accordance with § 173.304 and otherwise in accordance with 49 CFR 176.

I hope this information is helpful.

Sincerely,

A handwritten signature in cursive script, appearing to read "Delmer F. Billings".

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

cc: USCG -HQ

Lavalle  
S 176.76  
00-0181

# SAMSON TUG & BARGE COMPANY, INC.

Phone (907) 747-8796 - Fax (907) 747-6560 - P.O.Box 559 - Sitka, Alaska 99835

## FAX TRANSMITTAL

Date: 13 JUNE '00 Time: 1010 AMST Fax Number: 202 366 3612  
ED Muzzullo - RSPA  
To: DST OHMS Location: WDSH.DC Pages: 1

REF: CARRIAGE OF PROPANE IN 330/331 TANKAGE ON DECK BARGES

1. May propane contained in a 330/331 approved tank (transportation vehicle) be loaded on a deck cargo barge either on a CFC cargo platform or in a ro-ro fashion and transported upon the high seas?
2. May propane be carried on a deck cargo barge in any fashion other than in a DOT51 approved tank?

We are in the Alaska trade, desiring to be legal and safe in all matters of transportation and time is of the essence in this issue. The "propane tank" issue is a hot item in the Northwest this summer and we have spoken with Mr. Charles Hoschmann, this date on this matter and he has recommended we forward this request.

We understand the time restraints you are working under, however we would request your immediate response to our questions, as the Alaskan summer can be a very short one. I am sincerely

A.  
AL SNELLING

