



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

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

JAN 17 2001

Mr. Milt Swenson
Division Manager
Arrow Tank and Engineering Co.
8950 Evergreen Boulevard
Minneapolis, Minnesota 55433

Ref. No. 00-0326

Dear Mr. Swenson:

This responds to your letter, dated November 9, 2000, requesting clarification of the requirements in the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) for stretching MC 331 cargo tanks that are not currently equipped with manhole assemblies. Specifically, you ask about requirements for manhole assemblies on stretched MC 331 specification cargo tanks.

As your letter notes, § 180.413(d)(3) of the HMR requires all new material, new equipment, and equipment affected by modification, stretching, or rebarrelling to meet the requirements of the specification in effect at the time such work is performed. As defined in § 180.403, "stretching" includes any change in the length, width, or diameter of a cargo tank. Thus, the cargo tank itself is "equipment" that will be affected by stretching. As such, the stretched cargo tank must meet the requirements of the specification in effect at the time the stretching is performed.

Accordingly, a stretched MC 331 cargo tank must be provided with a manhole assembly in conformance with § 178.337-6. As specified in § 178.337-6, a stretched MC 331 cargo tank constructed of NQT steel with a capacity of 3,500 gallons or less may be equipped with an inspection opening instead of a manhole assembly.

I hope this information is helpful. If you have further questions, please do not hesitate to contact this office.

Sincerely,

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



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180.413



Gorsky
\$ 180.413
Repairs

00-0326

November 9, 2000

Mr. Edward T. Mazzullo, Director
Office of Hazardous Material Standards
United States Department of Transportation
Research and Special Programs Administration
400 Seventh Street, Southwest
Washington, DC 20590

RE: Request for Clarification-Stretching of Propane Bobtail Barrels

Dear Mr. Mazzullo;

I am writing to you, to clarify Arrow Tank & Engineering's thoughts on the issue that Mr. Rich Willard of Keehn Service Corporation has brought to your attention in his letter dated November 8, 2000. Rich and I have discussed this issue for about two or three months, and have a slightly different view of the DOT regulation 180.413 (d) (3). We also have customers who are currently considering "stretching" some of their older, smaller barrels to a larger size. These older barrels are predominantly 72" diameter, and are typically between 2400 and 2600 gallons. We will not consider stretching these barrels unless they are DOT MC-331 or 330 spec. These barrels are increased in size to 3000 gallons.

As Rich pointed out, Part 180.413 (d) (3) specifies "all new material and equipment" ... "must meet" current "specifications". This is straightforward, and in our judgement would refer to the new added shell plate, and any code work done in attaching this shell plate. If this was the only reference to material and equipment, we feel that it would not require a manway installation because the rear head is not altered. The discussion point between Rich and I has centered on the following statement in the regulations: "and equipment affected by modification". This part hinges on the definition of "equipment", which, if it includes the vessel proper itself could then be interpreted to mean that a manway would be required on vessels smaller than 3500 gallons that are stretched. (Vessels stretched to 3500 gallons or larger would automatically require a manway.) However, if the definition of "equipment" does not include the vessel proper itself, then our interpretation would be that a manway would not be required unless there is a rear head replacement.

Thank you in advance for your consideration in this matter, and please advise at your earliest convenience, of your interpretation of the regulations pertaining to "stretching" of existing barrels. I can be reached at the following numbers or e-mail.

1-800-333-5532, fax; 1-763-786-2104, e-mail; milt@propane.arrowtank.com

Sincerely,

A handwritten signature in black ink that reads "Milt Swenson". The signature is written in a cursive, flowing style.

Milt Swenson
Division Manager