



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

# Memorandum

Date: MAY 21 2002

Reply to Attn. of: Ref. No. 02-0029

Subject: Response to Request for Interpretation

From: Delmer Billings *For Andrew West*  
Chief, Standards Development  
Office of Hazardous Materials Standards

To: William Quade  
Chief of Hazardous Materials Division  
Federal Motor Carrier Safety Administration

This responds to your request for clarification, by memo dated January 25, 2002, related to the marking and placarding requirements applicable to the transportation of propane in storage tanks under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171 -180). Specifically, you requested our office to review your draft of interpretation and clarify any issues, if applicable.

Note, your letter of clarification has been reviewed and revised as follows:

Q1. What are the marking requirements for a propane storage tank meeting the definition of a bulk package that is transported by highway in accordance with the provisions of 49 CFR 173.315(j)?

A1. Under the requirements in 49 CFR §172.302 and §172.331, a storage tank that is a bulk packaging must be marked with the identification number. If the tank capacity is greater than 1000 gallons, the tank must be marked on each side and each end. If the tank capacity is less than 1000 gallons, the tank need only be marked on two opposing sides. In addition, § 172.331 requires the transport vehicle to be marked if the identification number is not visible.

Q1. What are the placarding requirements for a propane storage tank meeting the definition of a bulk package that is transported by highway in accordance with the provisions of 49 CFR 173.315(j)?

A1. Under the requirements in 49 CFR §172.504 and §172.514, a bulk package containing any quantity of HM must be placarded on each side and each end. If the placards are not visible, the transport vehicle must also be placarded. Section 172.514 also permits a bulk storage tank with a

volumetric capacity of less than 18 cubic meters (640 cubic feet) to be placarded on two sides, or alternatively, labeled in accordance with subpart E of 49 CFR Part 172. In all cases, however, the transport vehicle must have placards that are visible on all four sides.

I trust this satisfies your inquiry. If this Office can be of further assistance, please contact us.

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U.S. Department  
Of Transportation  
Federal Motor Carrier  
Safety Administration

# Memorandum

Webb

§173.315

Cargo Tanks

Midwest Service Center

Subject: Request for Interpretation  
Marking & Placarding Requirements  
for Propane Storage Tanks

02-0029  
Date: 01-25-2002

From: Joe DeLorenzo  
HazMat Specialist

In Reply Refer To:  
MC-EFM-SV

To: Bill Quade  
Chief, HazMat Division

Attached is a request for interpretation, with a proposed answer regarding the marking and placarding requirements for a propane storage tanks transported in accordance with 49 CFR 173.315(j). Also attached are several interpretations that were reviewed in developing this request. In some cases these interpretations conflict with one another or do not provide a comprehensive answer to the general question, and this was the primary reason for developing this request. In the case of June 1989 interpretation, it states that a placarding exception is provided for a tank of less than 1000 pounds aggregate gross weight, however there is no basis in the regulations for this as these are bulk packages. The attached interpretation would clarify these issues.

Please feel free to contact me if you need any additional information.

correct for time period i.e. 1989  
HJM

cc: Danny Shelton

Attachment(s)