



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

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

JUL 1 - 2002

Mr. Carlton W. Hendrix, Jr.  
230 Ellenwood Drive  
Canton, GA 30115-8276

Ref No. 02-0140

Dear Mr. Hendrix:

This is in response to your May 1, 2002 letter requesting interpretation of the Hazardous Materials Regulations (HMR; 49 CFR Parts 100-185) applicable to open valves on cargo tanks. Specifically, you question the practice of some transporters of non-flammable, compressed gases leaving a valve, located between the pump and the cargo tank's hose connection, slightly open on transports with a capacity greater than 3500 water gallons. Per your letter, the purpose of this practice is to allow any excess pressure that builds up in the 2 inch "wet" hose to return to the cargo tank through the bypass feature of the internal valve.

As provided in § 177.840(g) each liquid discharge valve on a cargo tank motor vehicle, other than an engine fuel line valve, must be closed during transportation except during loading and unloading. 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. The main internal valve and delivery hose end valve must be closed while in transport. You are not required to close any other valves in the system.

I hope this information is helpful. If we can be of further assistance, do not hesitate to contact us.

Sincerely,

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

230 Ellenwood Drive  
Canton, GA 30115-8276

May 1, 2002

Mr. Thomas G. Allen  
Senior Transportation Regulations Specialist  
Office of Hazardous Materials Standards  
U. S. Department of Transportation  
400 Seventh Street, S.W.  
Washington, D.C. 20590

Footer  
§ 177.840 (g)  
Cargo Tanks  
02-0140

Dear Sir:

I have a question concerning the requirements found in 49 CFR 177.840, (g). It states "Each liquid discharge on a cargo tank, other than an engine fuel line valve, must be closed during transportation except during loading and unloading."

There are some transporters of non-flammable, compressed gases that are leaving the valve, located between the pump and the cargo tank's hose connection, slightly open on transports with a capacity greater than 3500 water gallons. The purpose of this is to allow any excess pressure that builds up in the 2 inch "wet" hose to return to the cargo tank through the bypass feature of the internal valve.

It is my belief that this practice is contrary to the requirement found in 177.840(g). Please advise if I am correct in my interpretation of the regulations so I can advise my clients.

Sincerely,

*Carlton W. Hendrix, Jr.*  
Carlton W. Hendrix, Jr.

(770) 345-9451

## ROUTING & REQUEST

Please...

- ☐ Read
- ☒ Handle
- ☐ Approve

To:

Foster

New

Intrepretation

And...

- ☐ Forward
- ☐ Return
- ☐ Keep or Recycle
- ☐ Review with Me

02-0140

From:



Post-it® 7664 CSM 1995

Date:

5/16/02

5/22/02

Del,

I called Mr Hendrix to  
confirm that he is referring to  
a liquid discharge valve, and not  
an intermediate isolation valve.

He confirmed his inquiry pertains  
to a liquid discharge valve only.

Thanks,

Allen

C. W. Hendrix, Jr.  
233 Ellenwood Drive  
Canton, GA 30115-8276



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