



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

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

MAY 13 2003

Mr. Johnny Cathey
Halliburton Energy Services
Health, Safety, & Environment
2600 South 2nd Street
Duncan, OK 73536-0431

Ref. No. 03-0047

Dear Mr. Cathey:

This responds to your February 13, 2003 letter requesting clarification on marking requirements in § 172.336(c)(1) in the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if your proposed multi-tank cargo tank motor vehicle (CTMV) configuration is eligible for provisions in § 172.336(c)(1) concerning identification number display.

According to your letter and enclosed drawing, your proposed CTMV will consist of 10 independently mounted cargo tanks on a trailer chassis, with 5 tanks mounted on each side for use in the oil and natural gas exploration industry. The tanks will have capacities ranging from 150 to 500 gallons. You ask if this design configuration would require that each tank display identification numbers on all four sides or would provisions in § 172.336(c)(1) be authorized.

It is the opinion of this Office that your proposed multi-tank CTMV is comprised of separate cargo tanks and is not a "compartmented" cargo tank as referenced in § 172.336(c)(1). Therefore, the provisions of § 172.336(c)(1) do not apply.

I hope this answers your inquiry.

Sincerely,

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



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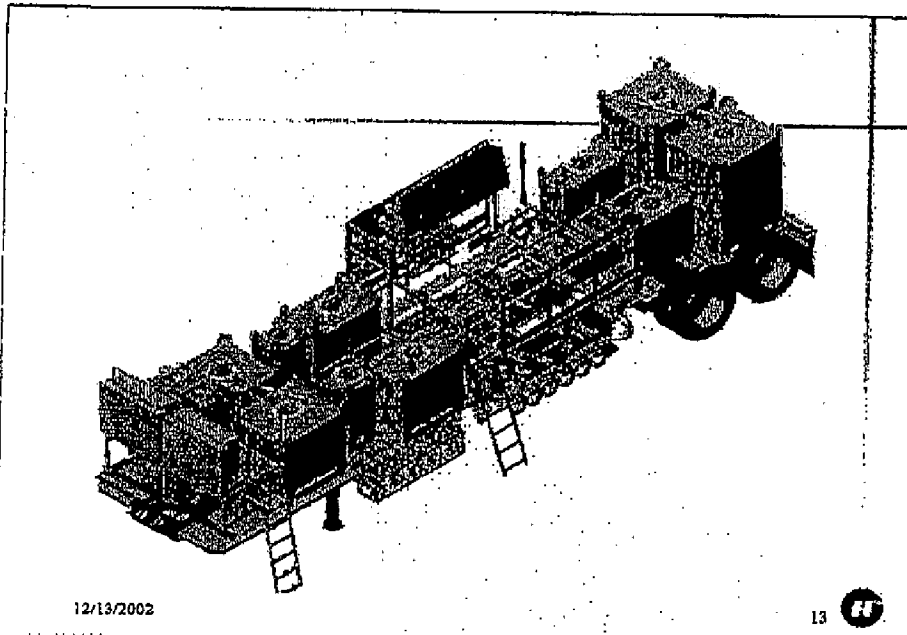
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§ 172.336(c)(1)
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03-004T

Johnny Cathey
From: Johnny Cathey
Sent: Thursday, February 13, 2003 11:31 AM
To: 'infocntr@rspa.dot.gov'
Subject: 172.336 - Identification Numbers; Special Provisions

Halliburton is currently in the design phase of a multi-tank cargo tank motor vehicle (CTMV) for use in the oil and natural gas exploration industry. The proposed configuration consists of 10 independently mounted cargo tanks on a trailer chassis, with five tanks mounted on each side. The tanks will have capacities ranging from 150 to 500 gallons. A rough drawing is attached for your review.

Would a CTMV in the configuration below be eligible for the special provision authorized under 172.336(c)(1) concerning ID number display, or would the configuration require that each tank display ID numbers on all four sides? Placards for each hazard class being transported would be affixed to each side and end of the CTMV.

Please let me know if any additional information is needed.



12/13/2002

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Regards,
Johnny Cathey
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