



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

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

OCT 30 2003

Mr. Lee K. Robinson
Sales Manager
Arbonite
3826 Old Easton road
Doylestown, PA 18901

Ref. No. 03-0225

Dear Mr. Robinson:

This responds to your September 8, 2003, letter requesting clarification on § 180.407(f) under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if a lining is required for a trailer carrying concentrations of 93-98% sulfuric acid (UN 1830) at ambient temperature.

The answer is no. In accordance with Special Provision B84, packagings containing sulfuric acid or spent sulfuric acid in a concentration up to 65.25 percent must be protected with non-metallic linings or have a suitable corrosion allowance. A lining is not required for packagings containing sulfuric acid in concentrations greater than 65.25 percent.

I hope this answers your inquiry.

Sincerely,

Susan Gorsky
Senior Transportation Regulations Specialist
Office of Hazardous Materials Standards



030225

180.407



arbonite

A DIVISION OF P & R INDUSTRIES, INC.

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Boothe
§ 180.407 (f)
Cargo Tanks
03-0225

September 8, 2003

US Department of Transportation
400 7th Street SW
Washington, DC 20590

Attention: Office of Hazardous Materials Standards

Dear Sir or Madam,

I am writing with reference to 180.407(f) Lining Inspection. Presently we are lining steel trailers with a baked phenolic or other thin film coatings. The purpose of the coatings is to prevent iron oxidation from the tank shell from contaminating the 93% to 98% sulfuric acid. It is also referred to as product protection.

93% to 98% sulfuric acid at ambient temperature has a corrosion rate between 2 mils to 20 mils per year. If the temperature goes up to 167 degrees the corrosion rate would be around 50 mils per year. Does the owner of the trailer need the trailer lined? Under Sec.172.101 Hazardous Material Table, more than 51% sulfuric acid is class 8 and packaging group II. The identification number is UN 1830. B84 is one of the special provisions. "Packaging must be protected with non-metallic linings impervious to the lading or have a suitable allowance for sulfuric acid or spent sulfuric acid in a concentration up to 62.25 percent.

So how about 93% to 98% sulfuric acid? Does our customer need a lining and does he need a "L" stamp for the inspection of the lining?

Thanks for you assistance.

Sincerely,

Lee K. Robinson
Sales Manager