



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

MAY 11 2004

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

Mr. Lee K. Robinson
Arbonite
3826 Old Easton Road
Doylestown, PA 18901

Ref. No. 04-0005

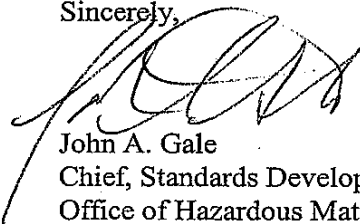
Dear Mr. Robinson:

This responds to your December 22, 2003, letter requesting clarification on inspection of non-DOT specification 407 and 412 cargo tanks constructed from glass fiber reinforced plastics (GFRP) under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask whether these cargo tanks are subject to the "L" lining inspection under § 180.407(f) and the internal visual inspection "I" under § 180.407(e).

Cargo tanks constructed from GFRP are authorized only by DOT exemption. These DOT exemptions, e.g., DOT E-11903 and DOT E-12516 enclosed, specifically waive Special Provisions B15 and B23 in the HMR. These cargo tanks do not have a lining and, therefore, are not subject to the lining inspection requirements of § 180.407(f). However, these cargo tanks are subject to the internal visual inspection requirements of § 180.407(e).

I hope this answers your inquiry.

Sincerely,



John A. Gale
Chief, Standards Development
Office of Hazardous Materials Standards

Enclosures



040005

180.407



arbonite

A DIVISION OF P & R INDUSTRIES, INC.

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Boothe
§ 180.407
Testing
04-0005

December 22, 2003

**U.S. Department of Transportation
Research and Special Programs Administration
400 Seventh St. S. W.
Washington, D.C. 20590**

**Attention: Ms. Susan Gorsky
Senior Transportation Regulations Specialist
Office of Hazardous Materials**

Dear Ms. Gorsky,

I am writing with reference to (GFRG) non-DOT specification cargo tank motor vehicles DOT 407 and DOT 412 that are constructed from glass fiber reinforced plastics. Do these tanks need the "L" lining inspection? If the answer is yes where is the regulation that I must refer to?

Also, on the same tanks as listed above, is the internal visual inspection "I" performed per regulation 180.407(e)?

Thanks very much for your assistance. I will look forward to hearing from you as quickly as possible.

Sincerely,

**Lee K. Robinson
Sales Manager**