



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, D.C. 20590

FEB 14 2008

Mr. Paul J. Dambek  
HAZMATEAM, Inc.  
12 Kimball Hill Road  
Hudson, NH 03051-3915

Ref. No. 07-0194

Dear Mr. Dambek:

This is in response to your September 26, 2007 letter regarding portable tanks under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180).

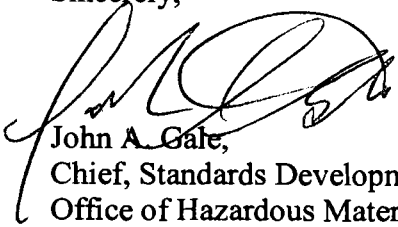
You state your client transports UN 1921 "Propyleneimine, stabilized, 3, 6.1, PGI" in portable tanks certified in Europe to "T19" criteria per ADR/RID/IMDG standards. You submitted copies of the inspection certificates for our review. Your client wants to use the portable tanks to transport the product by motor vehicle in the United States. Your questions are paraphrased and addressed as follows:

- Q1. Would a portable tank meeting the "T14" and/or "T19" criteria in the ADR/RID/IMDG standards also meet the "T14" and/or "T19" criteria in the HMR?
- A1. Yes. The criteria specified for the Codes "T14" and "T19" in the HMR are consistent with the criteria specified for these Codes in the UN Recommendations on the Transport of Dangerous Goods and the International Maritime Dangerous Goods (IMDG) Code.
- Q2. Does the HMR allow a portable tank authorized to the "T19" criteria to be used to transport a hazardous material requiring a "T14" authorization?
- A2. Yes. The criteria specified for these T Codes ("T19" and "T14") are identical with the exception that the minimum test pressure is specified at 6 bar for Code "T14" and 10 bar for Code "T19." Section 172.102(c)(7)(v)(A) provides that when a portable tank is specified by a "T" Code in Column (7) of the § 172.101 Hazardous Materials Table for a specific hazardous material, a specification portable tank conforming to an alternative tank instruction may be used if the alternative portable tank has a higher or equivalent test pressure.
- Q3. Would the six (6) portable tanks specified in the accompanying inspection certificates be allowed to transport "Propyleneimine, stabilized" in the United States without further approval or testing?

A3. Provided they are certified and marked as UN portable tanks, the six (6) portable tanks specified in the accompanying inspection certificates would be allowed to transport "Propyleneimine, stabilized" in the United States without further approval or testing (See § 171.25(c) of the HMR.)

I hope this information is helpful.

Sincerely,

A handwritten signature in black ink, appearing to read "John A. Gale", written over the typed name and title.

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



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Foster  
§ 172.101  
§ 178.273  
Portable Tanks  
07-0194

September 26, 2007

Office of Hazardous Materials Standards  
Pipeline and Hazardous Materials Safety Administration  
ATTN: PHH-10  
U.S. Department of Transportation  
400 7<sup>th</sup> Street  
Washington, D.C. 20590

Dear Sirs:

I am writing on behalf of a client who wishes to ship Propyleneimine, stabilized, UN 1921, within the United States, in a portable tank that was authorized for use in Europe per ADR/RID/IMDG standards. Our client wishes to ship these tanks via ground in the United States.

These six tanks were all certified to T19 criteria in Europe per ADR/RID/IMDG. Inspection Certificates for each are attached. Column 7 of the Hazardous Materials Table (49 CFR 172.101) authorizes a T14 portable tank for this chemical.

My questions are as follows:

- 1) Are tanks that have been authorized to T14 and/or T19 per ADR/RID/IMDG standards also authorized to T14 and/or T19 criteria per 49 CFR?
- 2) Section 4.2.5.2.5 of the IMDG Code permits a portable tank which has been certified to T19 to be used to transport a chemical that requires T14 certification. Is this allowed per 49 CFR?
- 3) Are the six tanks in question suitable for transportation within the United States without further approval or testing per the requirements of 49 CFR 178.273?

Your assistance is greatly appreciated.

Sincerely,

Paul J. Dambek

cc: Leo Traverse  
Michael Strong





RAPPORT DE VISITE PERIODIQUE  
PERIODIC INSPECTION REPORT



CONTENEURS / CAISSE MOBILE  
TANK CONTAINER / SWAP BODY

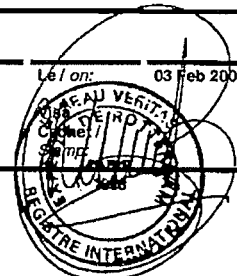
Immatriculation / Unit:  
VT15

Nature / Scope:  
5 year

**BUREAU  
VERITAS**

PROPRIETAIRE / OWNER Neo Resins		AFFAIRE / File NB:	
EXPLOITANT / OPERATOR		Lieu d'intervention / Place of insp: Cotac CWP	
MATIERES AUTORISEES AU TRANSPORT: SUBSTANCES SUITABLE FOR TRANSPORT:		UN 1921	
<b>CARACTERISTIQUES / CHARACTERISTICS</b>		<b>DATES D'INSPECTIONS / INSPECTIONS DATES</b>	
Constructeur / Manufacturer: Umformtechnik Hausach / Country: DE		Epreuve initiale / Initial pressure test: 15 May 1998	
Dimensions / Type ISO: 0x0x0 mm / UN appr.country:		supervisée par / performed by: SVTI - ASIT	
Type citerne / Tank type: IMO 1		Dernière inspection / Last inspection: 15 Jul 2003	
Code citerne / Tank code: L10DH - Spec.Prov:		effectuée par / performed by: SVTI - ASIT	
N° de série / Manuf. serial n°: 02430		Date(s) de l'inspection / Date(s) of insp: From 23 Nov 2005	
Masse brute max / Max. permissible gross mass: 2800 kg		To 14 Dec 2005	
Tare: 762 kg		Proch. visite régl. avant / Next reg. insp. before: 14 Jun 2008	
Charge utile / Payload: 2038 l			
Capacité / Capacity: 1250 l			
<b>CITERNE / TANK</b>		<b>CONTROLES EFFECTUES / INSPECTIONS PERFORMED</b>	
Matériau / Material: F / H: DIN 17440 - 1.4541		NA* NA*	
V / S: DIN 17440 - 1.4541		S0* WR*	
V / S: DIN 17440 - 1.4541		V0* SR*	
Nb de compartiments / Nb of compartments: 1		Visite intérieure	
Pression maxi de service / Max. allowable work pressure: 7,7 bar		Internal inspection	
Pression d'épreuve / Hydr. test pressure: 10 bar		Visite extérieure cit. calorifugée	
Pression ext. de calcul / Ext. design pressure: bar		External inspection insulated tank	
Temp de calcul / Range design temp < 20 °C			
Ep. mini de const. / Construc. mini thickness F / H: 6.00 mm		Visite extérieure cit. non calorifugée	
Ep. mini de const. / Construc. mini thickness V / S: 6.00 mm		External inspection non insulated tank	
Ep. équiv d'acier doux / Eq. thckn. mild steel: USDOT mm			
IMDG mm			
<b>EQUIPEMENTS / EQUIPMENT</b>		<b>Méasure des épaisseurs</b>	
Vidange basse / Bottom discharge: NO		Thickness measurements	
Vidange haute / Top discharge: YES			
Nb de fermetures en série / Nbr of closures in series: 2		Vérification du tarage de(s) soupape(s)	
Réchauffeur / Heater: None		Checking of valve(s) setting	
Nb Soupapes: 1 Tarage 7,3 bar En série: YES		Vérification des équipements	
Relief valves Setting: bar in series		Checking of equipment	
Nb Disques: 1 Tarage 10 bar En parallèle: NO		Vérification de l'étanchéité	
Rupture discs Setting: bar in parallel		Checking of tightness	
Nb Fusibles: Température: °C		Epreuve hydraulique réglementaire	
Fusible elem Temperature		Reg. hydraulic test pressure - 10 bar	
		Date: 23 Nov 2005	
<b>PROTECTION/REVETEMENT / PROTECTION/LINING</b>			
Interne / Internal: Externe / External: None		Epreuve de réchauffeur	
		Pressure test of heater	
<b>REGLEMENTATION APPLIC. / APPLIC. REGULATIONS</b>			
(Sulvant marquage sur le conteneur citerne) (According to marks found on tank container)		Examen de la structure	
IMDG: IMO 1		Examination of frame	
ADR/RID: N/CR 01023/BV		Examen du marquage	
		Examination of marking	
		* NA: Non applicable - SO: Sans observation - VO: Voir observation	
		*NA: Not applicable - WR: Without remark - SR: See remark	
<b>OBSERVATIONS / REMARKS</b>			
Safety Relief Valve(s): Kito - Serial Nr(s): 15			
<b>MARQUAGE ET POINCONNAGE:</b> MARKING & STAMPING: 5Y 12/05		Etabli a / Issued at: Rotterdam	
		Le / on: 03 Feb 2006	
		Inspecté par / Inspected by: Cees van-den-Ende	
NEXT SUBSEQUENT CSC:			

Ces informations correspondent aux marquages de l'équipement au moment de l'inspection et figurent dans un but d'identification seulement. À l'exception des informations résultant de tests et examens réglementaires. All data from tank markings at time of inspection are for identification purpose only, except data resulting from statutory tests and examinations.





RAPPORT DE VISITE PERIODIQUE  
PERIODIC INSPECTION REPORT



CONTENEURS / CAISSE MOBILE  
TANK CONTAINER / SWAP BODY

Immatriculation / Unit:  
VT16

Nature / Scope:  
5 year

**BUREAU  
VERITAS**

Ces informations correspondent aux marquages de l'équipement au moment de l'inspection et figurent dans un but d'identification seulement. À l'exception des informations résultant des tests et examens réglementaires. All data from tank markings at time of insp. in case for identification purpose only, except data resulting from situation tests and examinations.

PROPRIETAIRE / OWNER Neo Resins		AFFAIRE / File NB:	
EXPLOITANT / OPERATOR		Lieu d'intervention / Place of Insp: Colac CWP	
MATIERES AUTORISEES AU TRANSPORT: SUBSTANCES SUITABLE FOR TRANSPORT:		UN 1921	
<b>CARACTERISTIQUES / CHARACTERISTICS</b>		<b>DATES D'INSPECTIONS / INSPECTIONS DATES</b>	
Constructeur / Manufacturer: Umformtechnik Hausach / Country: DE		Epreuve initiale / Initial pressure test: 15 May 1998	
Dimensions / Type ISO: 0x0x0 mm / UN appr.country:		supervisée par / performed by: SVTI - ASIT	
Type citerne / Tank type: IMO 1		Dernière inspection / Last inspection: 15 Jul 2003	
Code citerne / Tank code: L10DH - Spac.Prov:		effectuée par / performed by: SVTI - ASIT	
N° de série / Manuf. serial n°: 02431		Date(s) de l'inspection / Date(s) of insp: From 23 Nov 2005	
Masse brute max / Max. permissible gross mass: 2800 kg		To 14 Dec 2005	
Tare: 763 kg		Proch. visite régl. avant / Next reg. insp. before: 14 Jun 2008	
Charge utile / Payload: 2037 l			
Capacité / Capacity: 1250 l			
<b>CITERNE / TANK</b>		<b>CONTROLES EFFECTUES / INSPECTIONS PERFORMED</b>	
Matériau / Material: F / H: DIN 17440 - 1.4541 V / S: DIN 17440 - 1.4541		NA* NA*	
Nb de compartiments / Nb of compartments: 1		S0* WR*	
Pression maxi de service / Max. allowable work pressure: 7,7 bar		V0* SR*	
Pression d'épreuve / Hydr. test pressure: 10 bar		X	
Pression ext. de calcul / Ext. design pressure: bar		X	
Temp de calcul / Range design temp <math>\leq 20</math> °C		X	
Ep. mini de const. / Construc. minl thickness F / H: 6.00 mm		X	
Ep. mini de const. / Construc. minl thickness V / S: 6.00 mm		X	
Ep. équiv d'acier doux / Eq. thicken. mild steel: US DOT IMDG mm mm		X	
<b>EQUIPEMENTS / EQUIPMENT</b>		X	
Vidange basse / Bottom discharge: NO		X	
Vidange haute / Top discharge: YES		X	
Nb de fermetures en série / Nbr of closures in series: 2		X	
Réchauffeur / Heater: None		X	
Nb Soupapes: 1 Tarage 7,3 bar En série: YES		X	
Relief valves Setting: bar in series		X	
Nb Disques: 1 Tarage 10 bar En parallèle: NO		X	
Rupture discs Setting: bar in parallel		X	
Nb Fusibles: Température: °C		X	
Fusible elem Temperature		X	
<b>PROTECTION/REVETEMENT / PROTECTION/LINING</b>		X	
Interne / Internal: Externe / External: None		X	
<b>REGLEMENTATION APPLIC. / APPLIC. REGULATIONS</b>		X	
(Sulvant marquage sur le conteneur citerne) (According to marks found on tank container)		X	
IMDG: IMO 1		X	
ADR/RID: NL/CR 01023/BV		X	
		* NA: Non applicable - SO: Sans observation - VO: Voir observation *NA: Not applicable - WR: Without remark - SR: See remark	
<b>OBSERVATIONS / REMARKS</b>			
Safety Relief Valve(s): Kito - Serial Nr(s): 16			
<b>MARQUAGE ET POINCONNAGE:</b> MARKING & STAMPING: 5Y 12/05		Etabli a / Issued at: Rotterdam	
		Inspecté par / Inspected by: Cees van-den-Ende	
NEXT SUBSEQUENT CSC:		Le / on: 03 Feb 2006	

