U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

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

AUG 1 5 2013

Mr. Danny Shelton
President
HazMat Resources, Inc.
124 Rainbow Dr., Suite 2471
Livingston, TX 77399-1024

Reference No. 12-0144

Dear Mr. Shelton:

This is in response to your e-mail requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR 171-180) applicable to marking requirements. Specifically, you ask what criteria establishes the minimum design metal temperature (MDMT) marking that must be included on the name plate on a cargo tank motor vehicle (CTMV) in accordance with the American Society of Mechanical Engineers Code (ASME Code), as prescribed in § 178.337-17.

Section 178.337-17(a) specifies that each cargo tank certified after October 1, 2004 must have a corrosion-resistant metal name plate and specification plate permanently attached to the cargo tank itself or the CTMV chassis. Further, § 178.337-17(a)(3) states that if the information required by this section is displayed on a name plate required by the ASME Code, the information need not be repeated on the specification plate. To answer your question regarding the marked MDMT, it is the lowest temperature permitted according to the ASME Code. Please note that the MDMT is generally not the same as a pressure vessel's lowest design temperature in the marking required by § 178.337-17(b)(4). A cargo tank's design temperature range is based on operating conditions, and is the lower of environmental (ambient) temperatures or the fluid temperature in or transiting the pressure vessel.

I hope this information is helpful. Please contact this office should you have additional questions.

Sincerely,

T. Glenn Foster
Chief, Regulatory Review and Reinvention Branch
Standards and Rulemaking Division

McIntyre
§178.337-17(b)(4)
Marking of Cargo Tanks

12-0144

Drakeford, Carolyn (PHMSA)

From: Betts, Charles (PHMSA)
Sent: Monday, July 02, 2012 7:43 AM
To: Drakeford, Carolyn (PHMSA)
Subject: FW: FW: 178.337-17(b)(4) DOT desgin temp range
Attachments: HM183NPRM-DesignTempRange.pdf

Importance: High

Carolyn –

Please log and assign the attached new request for clarification.

Thanks,
Charles

From: Danny Shelton [mailto:shelton10104@gmail.com]
Sent: Saturday, June 30, 2012 9:42 AM
To: Betts, Charles (PHMSA)
Cc: Staniszewski, Stanley (PHMSA)
Subject: FW: FW: 178.337-17(b)(4) DOT desgin temp range
Importance: High

Good morning Mr. Betts, please accept this email as a request for an interpretation regarding the Minimum Design Metal Temperature. I do not believe this issue has been addressed.

Regards

From: Staniszewski, Stanley <RSPA>
Sent: Wednesday, June 30, 2004 8:53 AM
To: Mitchell, Hattie <RSPA>; Hochman, Charles <RSPA>; Reeves, Douglas <RSPA>; Olson, Philip <RSPA>; Shelton, Danny; Quade, William; Stevens, Michael <RSPA>; Webb, Sandra <RSPA>; Billings, Delmer <RSPA>
Cc: Evans, Joseph; Delorenzo, Joseph
Subject: Re: FW: 178.337-17(b)(4) DOT desgin temp range
Importance: High

Folks:
We need to come to closure on this.
Unless I've missed something can we?

Based on the attached excerpt from the past we have stated that the design temp range is an "OPERATIONAL" issue; however we went on to say that this "might affect the strength and physical properties of the cargo tank's material of construction." Based on the prior "Operational" premise, we should be telling industry that this entry is not the ASME "MDMT" and they should be putting in temperatures that reflect their best judgment of the ambient/environmental temperatures the tank might operate in.

Hattie - can you get something put together to convey this to industry/Thanks

Stan
-----Original Message-----
From: Greg McRae [mailto:Greg.McRae@trin.net]
Sent: Tuesday, June 29, 2004 10:49 AM

To: Staniszewski, Stanley <RSPA>
Subject:

Re: New regulations for MC-331 Nameplate information.
We are going under the assumption that **Design Temperature** will be a requirement on the nameplate. We needed to order the plates! So, going under that assumption, can we find out what criteria establishes **Design Temperature** so we can make the proper entry on the plates.

Regards,
Greg McRae
Engineering and Technical Director
Trinity Industries Inc.
LPG Container Div.
CEM Group
ph.214-589-8559
fx. 214-589-8303

-----Original Message-----
From: Greg McRae [mailto:Greg.McRae@trin.net]
Sent: Friday, June 14, 2004 10:23 AM
To: Staniszewski, Stanley <RSPA>
Subject:

Good morning Stan,
A question that I mentioned to you at the meeting is in regards to the new regs. That become effective in Oct.
In paragraph 178.337-17 ,Markings, (b) 4
Is the stamping required in line 4 the same that is already required by ASME? An example of the stamping on a truck tank nameplate of SA-612 material is as follows,

MAWP 250 psi @ 125 degrees----- (Propane at 125 degrees is 250 psi vs. the material max.range is 200 degrees)
MDMT -8 degrees@250 psi
I hope the MDMT doesn't confuss someone in the middle of winter in Minnesota on a -40 degree day and think the tank can no longer can be operated.

Regards,
Greg McRae
Engineering and Technical Director
Trinity Industries Inc.
LPG Container Div.
CEM Group
ph.214-589-8559
fx. 214-589-8303