



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

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

MAY 28 2014

Mr. Clayton George
Practical Engineering Solutions, LLC
P.O. Box 51564
Lafayette, LA 70503

Ref. No. 14-0061

Dear Mr. George:

This responds to your initial March 26, 2014 email, and follow up email communications with a member of my staff requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) regarding the packaging requirements for bulk quantities of combustible liquids, known as drill cuttings¹, by vessel and motor vehicle. Your questions are paraphrased and answered as follows:

Q1. What are the requirements in the HMR for manufacturing a non-specification portable tank designed to transport drill cuttings that meet the definition of a combustible liquid by both vessel and motor vehicle?

A1. All bulk packagings (both specification and non-specification) are subject to the requirements of part 173, subparts A and B, including the general packaging requirements in § 173.24 and the additional general requirements for bulk packagings in § 173.24b. Section 173.241 provides the requirements for bulk packagings for certain low hazard liquid and solid materials including combustible liquids. Further, § 173.241(c) authorizes the use of non-specification portable tanks for certain low hazard liquid and solid materials including combustible liquids. The requirements of § 173.241(c) apply to transporting combustible liquids by all modes and refers to § 176.340 for the transportation of combustible liquids by vessel. Section 176.340(b) sets forth the conditions under which non-specification portable tanks are authorized for vessel transport, and requires that each non-specification portable tank must conform to the specifications of a DOT 57 portable tank, with certain conditions and exceptions that are detailed in § 176.340(b)(1) through § 176.340(b)(10).

¹ Drill cuttings are fragments of rock created when a well is drilled into the seabed and underlying rock to reach oil and gas trapped below. These cuttings can vary in size and texture, from fine silt to gravel. The cuttings are carried back to the surface by the drilling mud, a special fluid used to lubricate and cool the drill bit, and to balance down hole formation pressures to prevent blowouts of oil and gas. The drill cuttings are transported in the drilling mud.

Q2. May I design a packaging for transporting drill cuttings that meet the definition of a combustible liquid according to the specifications of DOT 57?

A2. The answer is yes. As set forth in § 176.340(b) a non-specification portable tank built to the DOT specification 57 portable tank standard that also meets the conditions and exceptions provided in § 176.340(b)(1) through § 176.340(b)(10) is authorized for the shipment of combustible liquids by vessel. Further § 173.241(c) would authorize this type of packaging for the shipment of combustible liquids by all modes. The specifications for DOT specification 57 portable tanks were removed from the HMR in final rule Docket HM-181E (59 FR 38040), effective July 26, 1994. However, DOT specification 57 portable tanks may be used if either requalified per § 178.605, provided they are represented as a non-specification portable tank, or if their specification plates or markings are covered.

Q3. Are the manufacturing requirements for non-specification portable tanks for transporting drill cuttings provided in § 176.340(b)?

A3. The requirements for non-specification portable tanks for transportation of combustible liquid by vessel are provided in § 176.340(b). Section 176.340(b)(1) states that portable tanks must conform to a DOT specification 57 portable tank, with conditions and exceptions that are set forth in § 176.340(b)(2) through § 176.340(b)(10). The requirements for DOT Specification 57 portable tanks are found in the HMR published before October 1, 1995.

I hope this information is helpful. If you have further questions, please contact this office.

Sincerely,



Robert Benedict
Chief, Standards Development Branch
Standards and Rulemaking Division

O'Donnell
§176.340(b)
§180.605

Drakeford, Carolyn (PHMSA)

From: Foster, Glenn (PHMSA)
Sent: Thursday, March 27, 2014 8:44 AM
To: Drakeford, Carolyn (PHMSA)
Cc: Staniszewski, Stanley (PHMSA); Benedict, Robert (PHMSA); Betts, Charles (PHMSA); Foster, Glenn (PHMSA); Kelley, Shane (PHMSA); Pfund, Duane (PHMSA); Supko, Ben (PHMSA)
Subject: FW: Cuttings Boxes USCG

Portable Tanks
14-0061

Carolyn,

Please have the email below checked in as a request for a letter of Interpretation.

Thanks,
Glenn

From: Clayton George [<mailto:cgeorge@eng-pes.com>]
Sent: Thursday, March 27, 2014 7:57 AM
To: Staniszewski, Stanley (PHMSA)
Cc: Foster, Glenn (PHMSA); Freeman, Cheryl (PHMSA)
Subject: Re: Cuttings Boxes USCG

Yes Stan. A formal letter would be very helpful.

Thank you,

Clayton George, PE
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www.eng-pes.com

On Mar 27, 2014, at 6:54 AM, "stanley.staniszewski@dot.gov" <stanley.staniszewski@dot.gov> wrote:

Clay:

As we discussed last week, sorry that you didn't get your questions answered by the Coast Guard, and I'm sorry I didn't get back to you sooner too, but my plans are always getting bumped due to other higher priorities.

Here is what I know.

For the case in point, since we are talking about a "Non-Spec based on DOT 57's" you should be fine with new construction of "cutting boxes", following what is described in 49CFR176.340(b).

As I suspected Spec. DOT 57's can't be constructed any more since they were dropped from the regs in Oct '96; however, they can still be used if maintained per 49CFR180.605.

Let me know if you need a formal letter of interpretation on this and I will get that process started.

Regards,
Stan

Stanley (Stan) Staniszewski Jr.
U.S. Department of Transportation
Pipelines and Hazardous Materials Safety Administration
East Bldg, PHH-22 Engineering
1200 New Jersey Ave., SE
Washington, DC 20590
202-366-0453

Have a complaint or question? Check our Web site at: <http://www.phmsa.dot.gov/phmsa-ext/feedback/hazmatComplaintsRegsViolationsForm.jsp> or call the Hazardous Materials Information Center at: 1-800-467-4922

The information contained in this message, and any attachments thereto, is for information purposes only and may contain the personal views and opinions of the author, which are not necessarily the views and opinions of the U. S. Department of Transportation, Pipelines and Hazardous Materials Safety Administration.

From: Clayton George [<mailto:cgeorge@eng-pes.com>]
Sent: Wednesday, March 26, 2014 4:04 PM
To: Staniszewski, Stanley (PHMSA)
Subject: FW: Cuttings Boxes

Stan,

Did you find anything in regard to my cuttings box questions? You had said you would have something for Wednesday.

- 1.) What specifications do I need to follow to design cuttings boxes for the gulf of mexico?
- 2.) Is DOT 57 still a current guide to follow?
- 3.) Is 49 CFR 176.340 to proper specification to follow for (b) non-specification portable tank?

Thanks,

Clayton George, PE
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<image001.jpg>
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25 BBL CUTTING BOX

Hot dipped galvanized interior and exterior for an extended service life. 3/8 inch steel sides and lids and 1/2 inch steel plate top and bottom. Bottom and top lift eyes with stacking pads. Hinged and gasketed lid secured with forge flange nuts and swing bolts.

Container constructed to meet DOT/Coast Guard regulation 49 CFR 176.340 for combustible liquids, with 1/2" plate floor and top, 3/8" walls and lids, 2-hinged and gasketed lids secured with forged flange nuts and swing bolts, bottom lift eyes, top lift eyes with stacking pads, pressure relief vent set at 5 PSI. The Tiger 25 BBL Cutting Box is designed for offshore dynamic lifting in accordance with the provisions of API RP 2A and SEPco document OPS0055.

SPECIFICATIONS:

Tare weight 5,360 LBS.

Max gross weight 30,000 LBS.

Safe working load weight 24,640 LBS.

Lid opening: 72" wide x 22" deep

Test pressure: 15 PSI

Design pressure: 10 PSI

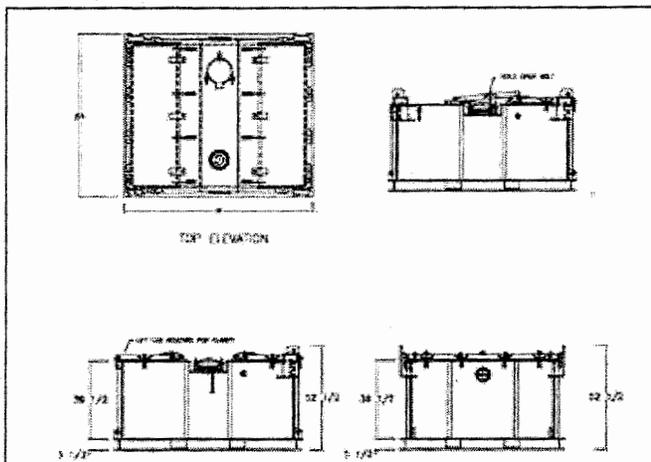
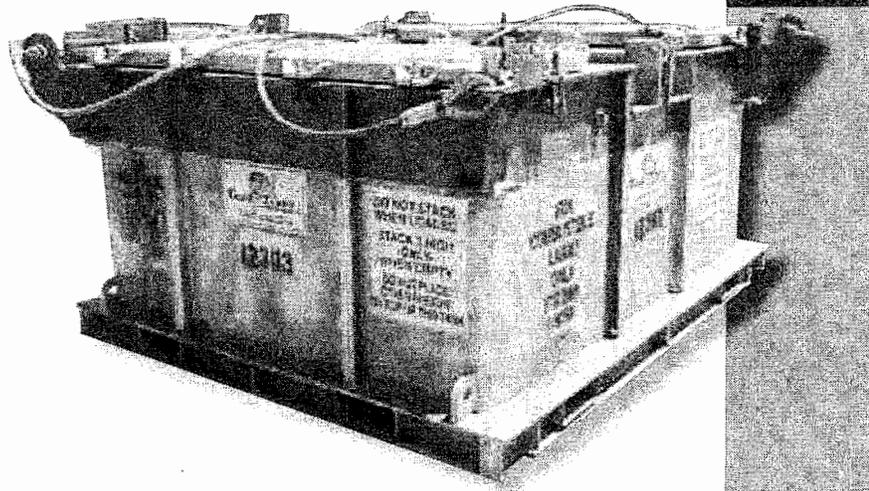
Product density 23.4 LBS./GAL.

(specific gravity 2.8)

Aluminum vacuum lids available

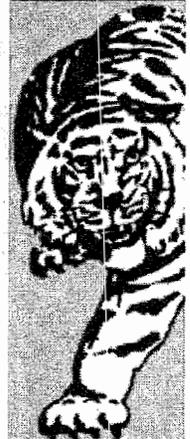
Outside dimensions:

84" wide x 96" deep x 52-1/2" high



CUTTING BOXES | **TIGER OFFSHORE RENTALS**

www.tigeroffshorerentals.com 1-877-844-3791



25 BBL CUTTING BOX

STRAPPING CHART

INCHES	BARRELS	GALLONS	INCHES	BARRELS	GALLONS
1	0.67	28	21	14.24	598
2	1.36	57	22	14.93	627
3	2.02	85	23	15.6	655
4	2.71	114	24	16.29	684
5	3.38	142	25	16.95	712
6	4.07	171	26	18.36	741
7	4.74	199	27	18.31	769
8	5.43	228	28	19	798
9	6.1	256	29	19.67	826
10	6.79	285	30	20.36	855
11	7.45	313	31	20.53	883
12	8.14	342	32	21.71	912
13	8.81	370	33	22.38	940
14	9.5	3.99	34	23	966
15	10.71	427	35	22.48	986
16	10.86	456	36	23.95	1006
17	11.52	484	37	24.43	1026
18	12.21	513	38	24.91	1046
19	12.88	541	39	25.38	1066
20	13.57	570			

