



U.S. Department
of Transportation

1200 New Jersey Avenue SE
Washington, DC 20590

**Pipeline and Hazardous
Materials Safety
Administration**

FEB 23 2015

Mr. Gregory R. Knauf
Process/Project Engineer
BASF Corporation
1215 Greenville Highway
Central, SC 29630

Reference No. 14-0209

Dear Mr. Knauf:

This is in response to your recent e-mail requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the portable tank requirements for non-liquefied compressed gas. Specifically, you ask whether non-liquefied compressed gases such as "UN 1954, Compressed gas, flammable, n.o.s., 2.1 (flammable gas)" and "UN 1956, Compressed gas, n.o.s., 2.2 (non-flammable gas)" may be placed in portable tanks that are prescribed for liquefied compressed gas in § 173.315 and the "T" Code, T50, found in § 172.102.

The answer is yes. Non-liquefied compressed gases are typically transported under high pressure. To withstand this pressure, the HMR require the tanks that transport these materials to be designed and constructed as a United Nations (UN) T50 portable tank. These compressed gas in portable tanks requirements are located in § 173.315(a)(1) and (a)(2) of the HMR.

We appreciate your bringing to our attention that the title and language contained in § 173.315 may be confusing because they do not specifically mention that some of the requirements in this section also apply to non-liquefied compressed gas. We may consider clarifying this title and requirement in a future rulemaking.

I hope this satisfies your request.

Sincerely,

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

Edmonson
§173.314
UN Portable Tanks
14-0209

Dodd, Alice (PHMSA)

From: Ciccarone, Michael CTR (PHMSA)
Sent: Thursday, October 30, 2014 3:13 PM
To: Hazmat Interps
Subject: FW: 49 CFR 172.101 and 173.314 Interpretation for UN1954 and UN1956 in UN Portable Tanks with provision T50

Shante/Alice,

Please submit this for a formal letter of interpretation. Mr. Knauf spoke with Raleigh Davis in the HMIC.

Thanks,

Mike

From: Gregory R Knauf [<mailto:gregory.r.knauf@basf.com>]
Sent: Thursday, October 30, 2014 3:04 PM
To: INFOCNTR (PHMSA)
Subject: 49 CFR 172.101 and 173.314 Interpretation for UN1954 and UN1956 in UN Portable Tanks with provision T50

Hello,

I'm following up for a formal written letter of interpretation regarding a discussion I had with Raleigh at the Hazardous Materials Information Center on 10/20/14 at 1:50 PM regarding shipping bulk UN1954 (Compressed gas, flammable, n.o.s.) and UN1956 (Compressed gas, n.o.s) materials in portable tanks. Basically, we are looking to ship UN1954 and UN1956 materials in a UN Portable Tank with provision T50.

The bulk packaging requirements for both UN1954 and UN1956 state that the material must be shipped in a package in accordance with §173.314 and §173.315. Because we are looking to ship these materials in portable tanks, only §173.315 applies. §173.315(a) says we can ship in a UN Portable tank under provision T50 (section 1) or in a Cargo tank or DOT specification tank (section 2). As I said, we are looking these materials in a UN Portable Tank with provision T50.

The title of section §173.315 is called "Compressed gases in cargo tanks and portable tanks"; however, the rest of the language in this section refers to "Liquified compressed gases". UN 1954 and UN1956 are compressed gases, not a liquified compressed gases. The choice of language in this section between "Compressed gases" and "Liquified Compressed Gas" is not clear. As said before, the bulk packing requirement for UN 1954 and UN1956 state to follow §173.315 "Compressed gases in cargo tanks and portable tanks".

With that in mind, the question to Raleigh was: Can UN1954 and UN1956 material be shipped in a UN Portable tank with provision T50 even though the language in the packaging instruction §173.315 refers to "liquified compressed gases" in its body text, not "compressed gases"?

After Raleigh discussed this with several colleagues, Raleigh's response was that **UN1954 and UN1956 materials can be shipped in a UN Portable Tank with provision T50.**

I'm looking to have her interpretation/question documented formally.

Thank you,
Gregory R. Knauf
Process/Project Engineer

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