



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue SE
Washington, DC 20590

JUL 09 2015

Mr. Greg McRae
Engineering and Technical Director
Trinity Containers, LLC.
2525 Stemmons Freeway
Dallas, TX 75207
Lewiston, NY 14092

Reference No. 14-0235

Dear Mr. McRae:

This is in response to your October 14, 2014 letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) regarding alternate pad designs for the attachment of appurtenances to cargo tank internal wall surfaces. Specifically, you ask if § 178.337-3 allows alternate pad designs to be used for the attachment of appurtenances to cargo tank internal wall surfaces provided that such designs do not affect the lading retention integrity of the tank. You note that each alternate design and its attachment have been proven by a finite element analyses and meet the allowable loads requirement of the American Society of Mechanical Engineers (ASME).

Section 178.337-3(g)(3) outlines the requirements for the use of mounting pads when welding any appurtenances to the cargo tank wall. Any pad design that complies with the requirements of § 178.337-3(g)(3) may be utilized. A mounting pad that does not meet the criteria shown in § 178.337-3(g)(3) may not be used for the attachment of appurtenances to cargo tank internal wall surfaces.

I trust this information is helpful. If you have further questions, please do not hesitate to contact this office.

Sincerely,

Duane A. Pfund
International Standards Coordinator
Standards and Rulemaking Division

Webb
178.337.3(g)(2)(B)
Structural integrity
14-0235

Goodall, Shante CTR (PHMSA)

From: Ciccarone, Michael CTR (PHMSA)
Sent: Friday, December 05, 2014 2:27 PM
To: Hazmat Interps
Subject: FW: two letters requestion Interpretations
Attachments: 20141205110044612.pdf

Shante/Alice,

Please submit this for a formal letter of interpretation. Mr. McRae spoke to Adam Lucas in the HMIC. Please note that there are two letters of interpretation attached.

Thanks,

Mike

-----Original Message-----

From: Greg McRae [<mailto:Greg.McRae@trin.net>]
Sent: Friday, December 05, 2014 11:53 AM
To: INFOCNTR (PHMSA)
Subject: two letters requestion Interpretations

Attention Adam: attached are the two letters that we were requesting Interpretations.

Thanks for your assistance a few minutes ago.

Regards,

Greg McRae
Trinity Containers, LLC.
214-454-9498

Notice: This email message, including any attachments, contains information belonging to Trinity Industries, Inc. and/or its business units. It has been sent solely for the use of the intended recipients and may contain non-public information and/or may be confidential, proprietary, copyrighted, and legally privileged. If you are not an intended recipient, please advise the sender of the error and permanently delete all copies of this email, including any copies that may reside in your deleted box. The unauthorized review, use, disclosure, distribution, or copying of this email or its contents is strictly prohibited.