



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

JAN 12 2016

Mr. Ray Williams
Texas Trailer Corporation
1310 Highway 82 West
Gainesville, TX 76240

Reference No. 16-0090

Dear Mr. Williams:

This letter is in response to your May 19, 2016, email and subsequent emails and phone calls requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to safety relief valves on cargo tanks. Specifically, you ask why the language in § 173.315(i)(3) was changed to omit cargo tanks and what setting requirements apply for the start-to-discharge pressure on a safety relief valve for a cargo tank motor vehicle in compressed gas service.

Section 173.315(a) authorizes the use of DOT specification (MC 330 and MC 331) cargo tank motor vehicles for certain compressed gases. Section 173.315(i) further describes requirements for pressure relief devices on “tanks,” applying to both cargo and portable tanks. On June 21, 2001, the Pipeline and Hazardous Materials Safety Administration’s (PHMSA) predecessor—Research and Special Programs Administration (RSPA)—published a final rule titled, “Harmonization with the United Nations Recommendations, International Maritime Dangerous Goods Code, and International Civil Aviation Organization’s Technical Instructions,” in the *Federal Register* under Docket No. RSPA-2000-7702 (HM-215D). This final rule amended § 173.315(i)(3) to add new requirements for United Nations (UN) portable tanks, which changed the term “tank” to specify a “portable tank, other than a UN portable tank,” and omitted cargo tanks from the requirement.

In accordance with § 173.33(d)(3), an MC 330 cargo tank may have pressure relief devices or outlets conforming to the applicable specification to which the tank was constructed, or the pressure relief devices or outlets may be modified to meet the applicable requirement for the specification MC 331. Pressure relief devices for MC 331 cargo tanks are specified in § 178.337-9, which references § 173.315(i). Section 180.407(j)(1)(iv) specifies each self-closing pressure relief valve for an MC 330 or MC 331 cargo tank must open at not less than the required set pressure and not more than 110% of the required set pressure, and must reseal to a leak-tight condition at no less than 90% of the required set pressure.

I hope this information is helpful. Please contact us if we can be of further assistance.

Sincerely,

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

Aehman
173.315
Compressed Gases in Cargo Tanks
16-0090

Goodall, Shante CTR (PHMSA)

From: Rivera, Jordan CTR (PHMSA)
Sent: Monday, May 23, 2016 12:55 PM
To: Hazmat Interps
Subject: FW: Setting of safety relief valves

Hi Shante/Alice,

Mr. Williams sent this is as additional information to add to his original interp request (forwarded on Friday 5/20). Please let me know if you have any questions.

Thank you,

Jordan

From: Ray Williams [<mailto:ray.williams@texastrailercorp.com>]
Sent: Monday, May 23, 2016 11:57 AM
To: INFOCNTR (PHMSA)
Subject: FW: Setting of safety relief valves

Hello Info Center,

If it is not too late, I would like to make one more request on the inquiry sent May 19, 2016.(See message below)

If we cannot apply the setting requirements now listed in 49 CFR 173.315 (3) to a cargo tank, please point out for us where to find the regulation for us to follow in fitting our cargo tanks with relief valves.

Best Regards,

Ray Williams

From: Ray Williams
Sent: Thursday, May 19, 2016 3:51 PM
To: infocntr@dot.gov
Subject: Setting of safety relief valves

Hello Info Center,

According to 49 CFR 173.315(i)(3), each Safety relief valve on a portable tank must be set to start-to discharge at pressure no higher than 110% of the tank design pressure and no lower than the design pressure specified in paragraph (a) of this section for the gas transported.

This section covers compressed gases in cargo tanks and portable tanks.

For more than 25 years, this paragraph related to "tank" and not to "portable tank".

Can we apply the setting requirements now listed in 49 CFR 173.315 (3) to a cargo tank as well as to a portable tank?

Please submit this to any department that can offer a written response to this inquiry.

Best Regards,

Ray Williams

Quality & Technical Services

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