



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, DC 20590

APR 25 2017

Mr. Ed Whittle  
Director  
OneCIS Insurance Company  
330 Lynnway  
Suite 403  
Lynn, MA 01901

Reference No. 16-0168

Dear Mr. Whittle:

This letter is in response to your October 11, 2016, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to MC 331 cargo tanks. Specifically, you seek clarification regarding the requirements to provide heat treatment information on the ASME U1-A data report when heat treatment is not required to be performed on a MC 331 cargo tank that is constructed of other than quenched and tempered (NQT) carbon steel.

There are no requirements per the regulations to provide heat treatment information on the ASME U1-A data report when such treatment is not required.

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

Sincerely,

Dirk Der Kinderen  
Chief, Standards Development Branch  
Standards and Rulemaking Division

Baker  
§ 178.337.18  
Cargo Tanks  
16-0168

**Dodd, Alice (PHMSA)**

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**From:** Rivera, Jordan CTR (PHMSA)  
**Sent:** Tuesday, October 11, 2016 1:49 PM  
**To:** Hazmat Interps  
**Subject:** FW: DOT interp. certificate and HT.

Hi Shante/Alice,

Please submit this as a letter of interpretation. Mr. Whittle spoke with Eamonn.

Please let me know if you have any questions.

Thanks,  
Jordan

**From:** [ed.whittle@onecis.com](mailto:ed.whittle@onecis.com) [<mailto:ed.whittle@onecis.com>]  
**Sent:** Tuesday, October 11, 2016 1:41 PM  
**To:** INFOCNTR (PHMSA)  
**Cc:** Greg McRae  
**Subject:** Re: DOT interp. certificate and HT.



**BUREAU  
VERITAS**

October 11, 2016

Submitted via e-mail: [infocntr@dot.gov](mailto:infocntr@dot.gov)

Standards and Rulemaking Division  
Pipeline and Hazardous Material safety Administration  
East Building, 2 Floor  
Washington D.C. 20590-0001

Attn: PPH-10

Request for Interpretation:  
Reference: CFR 178.337-18 Certification

Dear Sirs:

Please provide clarification as to information that is to appear on a manufacturers Certificate for MC-331 cargo tanks.

Background: MC-331 cargo tank manufactured of carbon steel, NQT material, and are not required to be heat treated by D.O.T. regulation or ASME code. When heat treatment is required by ASME and DOT regulations, the manufacturer's nameplate is stamped with the required marking and so noted on the manufacturers U1-A data report.

Question: Is the manufacturer required to also list functions that are not required to be performed such as heat treatment for the cargo tank described above?

Please contact me if you have any questions. I may be reached via phone at 781-584-1104 or email: [ed.whittle@onecis.com](mailto:ed.whittle@onecis.com).

Best Regards,

Ed Whittle

Director,  
Codes and Standards



**Ed Whittle**  
Director, Codes & Standards  
**OneCIS Insurance Company**  
A Bureau Veritas Company  
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**Management Systems Global Certifications:**

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From: Ed Whittle/USA/VERITAS  
To: [infocntr@dot.gov](mailto:infocntr@dot.gov)  
Cc: Greg McRae <[Greg.McRae@trin.net](mailto:Greg.McRae@trin.net)>  
Date: 10/11/2016 10:56 AM  
Subject: DOT interp. certificate and HT.

Dear US DOT:

Please consider this request for a written interpretation on section 49 CFR 178.337-18.

[attachment "US DOT interpretation Request 178 337-18-pdf.zip" deleted by Ed Whittle/USA/VERITAS]

Regards,

Ed Whittle



**Ed Whittle**

Director, Codes & Standards

**OneCIS Insurance Company**

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