



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, DC 20590

APR 05 2017

Mr. Glenn Gillaspia  
Compliance Manager  
SGS Petroleum Service Corporation  
5055 Preston Avenue  
Pasadena, TX 77505

Reference No. 16-0176

Dear Mr. Gillaspia:

This letter is in response to your October 20, 2016, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to securement of rail tank car closures. Specifically, you ask whether chains are required on caps or plugs used to secure openings on product and vapor valves located inside the top housing on DOT Specification 111 tank cars.

The answer depends on the design as it was approved by the Association of American Railroads (AAR) Tank Car Committee. As prescribed in § 179.200-17(a)(1), bottom outlet reducers, closures, and their attachments are required to be secured to the car by 3/8-inch or 1/4-inch chain under certain conditions. The HMR do not contain a similar provision for top fittings, such as liquid and vapor valves on DOT Specification 111 tank cars. However, §§ 179.3 and 179.200-16 require the tank car design and top loading and unloading devices to be approved by the AAR Tank Car Committee. Thus, a chain is required on a liquid or vapor line closure, such as a pipe plug, if the tank car design as approved by the AAR Tank Car Committee includes a chain attached to the closure.

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

Stevens  
\$179,200  
Paul

16-0176

**Dodd, Alice (PHMSA)**

---

**From:** Rivera, Jordan CTR (PHMSA)  
**Sent:** Wednesday, October 26, 2016 9:22 AM  
**To:** Hazmat Interps  
**Subject:** FW: Interpretation Request

Hi Shante/Alice,

Please submit this as a letter of interpretation. I have been unable to get in contact with Mr. Gillaspia.

Please let me know if you have any questions.

Thanks,

Jordan

**From:** Gillaspia, Glenn (Pasadena) [mailto:glenn.gillaspia@sgs.com] [mailto:glenn.gillaspia@sgs.com]  
**Sent:** Thursday, October 20, 2016 1:52 PM  
**To:** PHMSA HM InfoCenter  
**Subject:** Interpretation Request

I would like some clarification on the following concerning general purpose DOT 111 rail cars. I have been told two different interpretations. Are chains required to be attached to the liquid and vapor caps / plugs, under the housing cover, on the top of the DOT 111 rail cars?

Thank you for any clarification  
Glenn

Glenn Gillaspia

Compliance Manager

SGS Petroleum Service Corporation

5055 Preston Ave.

Pasadena, TX. 77505

Phone: 281-991-3500

Mobile: 713-924-8051

Information in this email and any attachments is confidential and intended solely for the use of the individual(s) to whom it is addressed or otherwise directed. Please note that any views or opinions presented in this email are solely those of the author and do not necessarily represent those of the Company. Finally, the recipient should check this email and any attachments for the presence of viruses. The Company accepts no liability for any damage caused by any virus transmitted by this email. All SGS services are rendered in accordance with the

applicable SGS conditions of service available on request and accessible at <http://www.sgs.com/en/Terms-and-Conditions.aspx>