



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

AUG 14 2017

Rob Berrier
Fleet Safety Manager
Jackson Energy/Capitol Distributing
3450 E. Commercial Court
Meridian, ID 83642

Reference No. 17-0048

Dear Mr. Berrier:

This letter is in response to your May 8, 2017, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the specification nameplate requirements for a Department of Transportation (DOT) 400-series cargo tank. Specifically, you provide a picture of a DOT-406 specification nameplate with a test pressure marking of "TEST PRESSURE: 5" and ask if it meets the requirements of § 178.345-14(b)(4) even though the unit of measure (i.e., psig) is not included on the nameplate.

The answer is yes. In accordance with § 178.345-14(b)(4), the corrosion resistant nameplate is required to display the "cargo tank test pressure (Test P), in psig." Because the unit of measure is specified in the HMR, it is understood that the test pressure marking on the nameplate is in psig. However, to avoid further frustration of shipments in the future, it is suggested that the unit of measure be included on the nameplate for all applicable information, but it 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
Standards and Rulemaking Division

Geller
§ 178, 345-14(b)(3)
Marking
17-0048

Dodd, Alice (PHMSA)

From: INFOCNTR (PHMSA)
Sent: Tuesday, May 09, 2017 4:01 PM
To: Hazmat Interps
Subject: FW: Interpretation request regulation 178.345-14(b)(3)
Attachments: beal.montana.noPSIG.JPG; SKMBT_22317050416170.pdf

Hi Shante/Alice,

Please submit this as a letter of interpretation. Eamonn spoke to a colleague of Mr. Barrier's on this.

Please let me know if you have any questions.

Thanks,
Jordan

From: Robert Berrier [mailto:Robert.Berrier@jacksonenergyco.com]
Sent: Monday, May 08, 2017 7:06 PM
To: PHMSA HM InfoCenter <PHMSAHMInfoCenter@dot.gov>
Subject: Interpretation request regulation 178.345-14(b)(3)

I would like to request an interpretation of 178.345-14(b)(3) reference having "PSIG" actually stamped on the name plate. Our company received a violation on a tanker unit for this and we have never received a violation for this or heard of this in over 20 years with over 45 tankers on the road. Please see attached violation and attached photo of the name plate from the manufacturer.

I have spoken with two FMCSA DOT agents and they have not heard of this violation and I am curious if what we have stamped (name plate from violation attached) would suffice. The pressure test is there.

Rob Berrier

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Jackson Energy / Capitol Distributing
(208) 888-6061 Office
(208) 800-2687 Cell
3450 E. Commercial Court
Meridian, ID 83642
E-Mail: Robert.Berrier@jacksonenergyco.com



DRIVER/VEHICLE EXAMINATION REPORT

Aspen 3.0.0.17

Arizona Department of Public Safety
Commercial Vehicle Enforcement Bureau
P. O. Box 18410
Phoenix, AZ 85005
Phone: (520) 746-4695 Fax: (602) 223-2330

Report Number: AZ0268001523
Inspection Date: 05/04/2017
Start: 10:35 AM MT End: 11:25:00 AM MT
Inspection Level: I - Walk-Around
HM Inspection Type: Bulk

JACKSONS FOOD STORES INC
3450 COMMERCIAL CT
MERIDIAN, ID 83642

USDOT#: 00205127 Phone#: (208) 866-8081
MC/MX#: 261482 Fax#:
State#:

Driver: THONGKUMSAI, BOBBY S
License#: D02920737 State: AZ
Date of Birth: 02/25/1971
CoDriver:
License#: State:
Date of Birth:

Location: INTERSTATE 10
Highway: I-10
County: PIMA, AZ

MilePost: 263 Shipper: KINDER MORGAN
Origin: TUCSON, AZ Bill of Lading:
Destination: PHOENIX, AZ Cargo: UN1203 GASOLINE

VEHICLE IDENTIFICATION

Unit	Type	Make	Year	State	Plate #	Equipment ID	VIN	GVWR	CVSA #	CVSA Issued #	COS Sticker
1	TT	PTRB	2015	ID	AK6953	1	1XP8DP9X1GD371210	52,000			
2	ST	BEAL	2005	ID	TF9039		1DN2T42265B007657	65,000			

BRAKE ADJUSTMENTS No Brake Measurements Required For Level 2

VIOLATIONS

Violation Code	Section	Unit	COS	Citation #	Verify	Crash	Violations Discovered
393.78	393.78	1	N		N	N	Windshield wipers inoperable/defective/NO WIPER FLUID
179.345-149	179.345-149	2	N		N	N	DOT406/49/7412 name plate: TEST PRESSURE ON NAME PLATE IS MISSING A UNIT OF MEASURE OF PSIG

HazMat: 3 Flammable

Placard: Yes Cargo Tank: 408

Special Checks: No Data for Special Checks.

*** WARNING *** If this box is checked, a separate traffic citation was issued to the violator. Please refer to the issued traffic citation for additional information. This is in addition to any action required by this report.

DRIVER & MOTOR CARRIER: This report must be furnished to the above named motor carrier. The motor carrier shall sign below and return, by mail or fax, within 15 days to:

Arizona Department of Public Safety
Commercial Vehicle Enforcement Bureau
PO Box 18410
Phoenix, Arizona 85005-6410
Fax: (602) 223-2330

Violations, other than out-of-service conditions, detected during the inspection process will not preclude the completion of the current trip or dispatch. However, such violations must be corrected or repaired prior to re-dispatch.

The undersigned certifies that all violations noted on this report have been corrected and action has been taken to assure compliance with the Federal Motor Carrier Safety and Hazardous Material Regulations adopted by Arizona Revised Statutes as they are applicable to motor carriers and drivers.

Signature Of Motor Carrier:

Title:

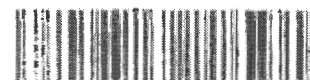
Date:

Report Forwarded By:
A GABLE

Address:
7880

Copy Received By:
BOBBY THONGKUMSAI

Page 1 of 1



00205127 47 470238001523

BEALL TRAILERS OF MONTANA CT/CTMV MFR.
BILLINGS MONTANA

MODEL: BAST-95-4-SB CTMV CERT. DATE: 2/05 SERIAL: ST-7657-05

DOT: 406-AL ORIG. TEST DATE: 2/05 MAWP: 3.3

TEST PRESSURE: 5 DESIGN TEMP. RANGE: -20 DEG. F TO 150 DEG. F

MAX. LADING WEIGHT: 7.5 MAX PAYLOAD: 56000

SHELL MATL: 5454-H32 NOM. THICK: .173 SHELL MFD. TOP: .179

HEAD MATL: 5454-0 NOM. HEAD: .173 MFD. TOP: .179

WELD MATL: 5356AL WELD MET. THICK: .173 DOT 1001: .189

NOM. CAPACITY (U.S. GALLONS): 3.0108 3.0108 4.2463

EXPOSED SURFACE AREA IN SQ. FT.: 8.0108 8.0108 11.0108

MAX. LOAD RATE, GPM: 750 750 1100

MAX. UNLOAD RATE, GPM: 400 400 550