

DHM-60



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

400 Seventh Street, S.W.
Washington, D.C. 20590

JAN - 7 1999

Mr. Charles Toth, Jr.
Operations Manager
Toth Aluminum Corporation
2141 Toth Street
Vacherie, LA 70090

Ref. No. 98-0364

Dear Mr. Toth:

This is in response to your letter dated December 2, 1998, concerning the use of stainless steel to meet the requirements of Special Provision B6 in the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180).

Special Provision B6 of the Hazardous Materials Regulations specifies that "packagings shall be made of steel." It is the opinion of this Office that the requirements of Special Provision B6 are satisfied with any bulk packaging made of stainless steel.

I hope this satisfies your request.

Sincerely,

A handwritten signature in black ink, appearing to read "John A. Gale".

John A. Gale
Transportation Regulations Specialist
Office of Hazardous Materials Standards

172.102

IAC

Toth Aluminum Corporation

98-0364

December 2, 1998

Edward Mazzulo
 Director - OHMS
 USDOT-Attn: DHM 10
 Research and Special Programs Administration
 400 7th St SW
 Washington, D.C. 20597

BAH
 \$ 172.102 B6

Dear Sir:

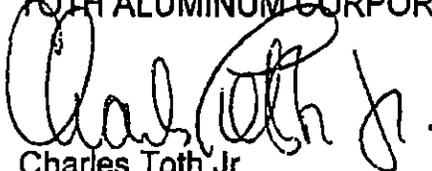
I am in the process of shipping Silicon Tetrachloride (UN 1818) in bulk via a MC 312 tank truck trailer with a shell constructed of 0.180" thick Manufacture T316SS-2B finish in accordance with 49CFR173.242. Attached are the complete specifications on the tank truck trailer.

However, special provision B6 States "Packagings shall be made of steel." Subsequently, Officer Ronnie Mayeaux of the Louisiana State Police Hazardous Materials Division, interprets this as excluding stainless steel. Therefore, he indicates that this trailer does not meet USDOT transportation 49CFR173.242 because it is made of stainless steel and not steel.

Would you be so kind as to verify that the stainless steel trailer listed above does meet USDOT transportation requirement. Time is of the importance and a prompt answer is greatly appreciated, if possible kindly respond via fax to (504) 265-7795, and follow up with an original copy in the mail. My mailing address is: Charles Toth Jr., C/O Toth Aluminum Corporation, P.O. Box 250, Vacherie, LA 70090. If you have any further questions, please call me at (504) 265-8181 or Mr. Will Farrar of the US EPA at (225) 291-4698.

Thank you

TOTH ALUMINUM CORPORATION



Charles Toth Jr.
 Operations Manager

CC: Will Farrar - US EPA

Headquarters: Highway 18--River Road, Vacherie, LA 70090 U.S.A.

Mailing Address: P. O. Box 250, Vacherie, LA 70090 U.S.A.

Phone: 504 265-8181 Fax: 504 265-7795 Cable Address: TACOR



REC'D NOV 24 1998

matlack leasing corporation

One Rollins Plaza, P.O. Box 8774, Wilmington, DE 19899 • 1-800-628-5225 Ext. 3164

November 24, 1998

Mr. Charles Toth, Jr.
Toth Aluminum Corporation
2141 Toth Street
Vacherie, LA 70090

Mr. Toth:

Per your discussions with Bill DeNike, attached please find specifications for the MC 312 in Houston, TX.

If you have any questions or require additional information please do not hesitate to call me at 800-628-5225 X2834.

Regards,

Donna S. Ricci
Customer Service Manger

10/10/96

(A6704)

FLEET ACCEPTANCE CORP.

Page 2 of 4

1. TANK SHELL & FINISH: .180" MANUF. T316SS-2B FINISH
2. SHELL HEAD & FINISH: .220" MANUF. T316SS-HRAP FINISH INSIDE, 4E POLISH OUTSIDE, ASME DISHED AND FLANGED, BUTT WELDED
3. INTERIOR WELD FINISH: W-2 SNAGPROOF WITH W-3 GROUND FLUSH ON BOTTOM 24"
EXTERIOR WELD FINISH: W-2 SNAGPROOF
4. BAFFLES: NONE
5. MANHOLE: (1) 20" FULL OPENING BETTS 8350-LC-E, (T316LSS) ASME APPROVED, 6 LUG WITH NON-ASBESTOS WITH TEFLON WOVEN GASKET, LOCATED NEAR CENTER OF TANK
6. HEAT: NONE
7. EXTERIOR RINGS: 10 GA. SS 2-3/4" HI HAT CHANNEL, CONTINUOUS WELD
8. FRAME: BOLSTERS: 10 GA. T304SS
LONGMEMBERS: 7 GA. T304SS ABOVE SUBFRAMES ONLY
9. INSULATION: NONE
UNDERLAYMENT: NONE
10. JACKET: NONE
JACKET HEADS: NONE
11. SPILLDAM: T304-2B SS AROUND MANHOLE WITH SLOPED FLOOR AND (1) 1 1/2" BLACK PVC DRAIN HOSE ON CURBSIDE
OVERTURNS: D.O.T. OVERTURN PROTECTION BUILT INTO ENDS OF DAM AND AT LAST RING
12. LADDER: (1) SS 18" WIDE WITH KNURLED RUNGS AND SIDE HAND RAILS, MOUNT CURBSIDE TO WALKWAY BELOW SPILLDAM
HAND RAIL: (1) FULL LENGTH OF WALKWAY LOCATED ABOVE LADDER
13. WALKWAY: 12" WIDE SS DIAMOND TYPE ON CURBSIDE AT APPROX. 3:00 FULL LENGTH OF SPILLDAM WITH GRAB RAILS EACH END
14. KINGPIN PLATE: HEAVY-DUTY BOLT-ON 4" INCREMENTS, 2" ADJUSTMENTS
15. LANDING GEAR: AUSTIN LIFT-PAK 2-SPEED WITH SAND SHOES, CURBSIDE CRANK, AND T304SS FRAME
16. SUSPENSION: REYCO MT. VERNON MODEL 88 WITH 3-LEAF SPRINGS AND FLANGEMOUNT HANGERS, T304SS FRAME
17. AXLES: INGERSOLL F22S 5" ROUND (22,500# RATING)
18. BRAKES: QUICK CHANGE, 16-1/2 X 7 S-CAM WITH ROCKWELL AUTOMATIC SLACK ADJUSTERS, NO DUST SHIELDS (20,000# RATING)
19. HUBS: WALTHER EMC 10 STUD WITH OUTBOARD MOUNTED REYCO DRUMS
HUBODOMETER: NONE

10/10/96

(A6704)

FLEET ACCEPTANCE CORP.

Page 3 of 4

20. SEALS: STEMCO GUARDIAN
21. RIMS/WHEELS: 8.25 X 24.5 STEEL DISC, FACTORY WHITE
22. TIRES: 11R-24.5 (G) BRIDGESTONE R194 14 PLY RADIALS
23. FENDERS: ALUMINUM CONTOUR FRONT AND REAR WITH SS BRACES
24. MUDFLAPS: 2 PAIR BRENNER PLASTIC ANTI-SAIL
25. BUMPER: (1) 4" X 8" T304SS RECT. TUBE, SPLIT TYPE, 60" WIDE, PER DOT RSPA SPECS, AND (1) 4" X 4" T304SS SQ. TUBE, 88" WIDE, PER IMPENDING DOT NHTSA RULES
26. TIRE CARRIER: NONE
27. WIRING: TRUCK-LITE HARNESS EXPOSED
LIGHTS: 12-VOLT TRUCK-LITE IN SS BOXES WITH SIDE MARKERS TIED INTO TURN SIGNALS
NOSE BOX: 7 WAY BERG ON FRONT CROSSMEMBER
28. HOSE CARRIER: (1) 6" X 8" X 21' SS HOSE TROUGH WITH DRAIN AT REAR, MOUNT CURBSIDE
29. OUTLET: (1) 4" SS MOUNTING PAD
EMERGENCY VALVE: (1) 4" X 3" X 90° SS BETTS EXTERNAL CHEMICAL HYDRAULIC VALVE (#CH45613-SS)
HYDRAULIC PUMP: ENERPAC LOCATED AT REAR ON ROADSIDE RUNNING GEAR FRAME RAIL
PIPING: (1) 3" SS SPOOL PIECE BETWEEN EMERGENCY VALVE AND OUTLET VALVE
OUTLET VALVE: (1) 3" SS GATE VALVE (ALLEGHENY SSG 1013)
FITTINGS: 3" FLANGED NOZZLE WITH 3" SS ADAPTER WITH SS DUST CAP
SEAL TABS: PROVISIONS FOR GOVERNMENT SEALS ON ALL OPENINGS
PUMP OFF LINE: NONE
CABLES: PLASTIC COATED ON ALL CAPS
TOP UNLOAD: (1) 4" SS A.N.S.I. FLANGED NOZZLE WITH BLANK FLANGE LOCATED AT TOP REAR ABOVE SUMP FOR FUTURE TOP UNLOAD
30. VENTS: (1) 4" GIRARD FLANGED PRESSURE RELIEF VENT (GEDOT-407AF) 35 PSI MAWP, RATED AT A TEST PRESSURE OF 52.5 PSI, COMPLETE WITH A TEFLON ENCAPSULATED O-RING, MOUNTED ON A 4" FLANGED PIPE WITH PRESSURE GAUGE AND AIR INLET ASSEMBLY, LOCATED TO REAR OF MANHOLE IN SPILLDAM
VACUUM RELIEF: NONE - DESIGNED FOR FULL VACUUM
31. CLEANOUTS: NONE
32. THERMOMETER: NONE
33. CAPACITY INDICATOR: NONE
34. CABINET: NONE
35. PAINT: CARBON STEEL PARTS DUPONT IMRON 5000 GRAY #N0427

10/10/96

(A6704)

FLEET ACCEPTANCE CORP.

Page 4 of 4

36. CONSPICUITY MARKING: INSTALL RETRO-REFLECTIVE TAPE IN ACCORDANCE WITH N.H.T.S.A. REQUIREMENTS
37. OTHER:
CALIBRATION: THEORETICAL COMPUTER PRINTOUT IN 1/4" INCREMENTS
DOT SIGN HOLDERS: (4) ALUMINUM SLIDE IN STYLE SIGN HOLDERS WITH SIDES MOUNTED ON RINGS APPROX. 60" FROM GROUND, FRONT AND REAR MOUNTED ON FRAMING
CERTIFICATE HOLDER: (1) BETTS PS-1 MOUNTED CURBSIDE ON LANDING GEAR FRAME