



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

JAN - 8 2001

Mr. John L. Conley
Vice President
National Tank Truck Carriers, Inc.
2200 Mill Road
Alexandria, Virginia 22314

Ref. No. 00-0336

Dear Mr. Conley:

This responds to your letter, dated November 29, 2000, concerning cargo tank inspections and tests required by the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if an insulated MC 330 or MC 331 cargo tank must be pressure tested in accordance with § 180.407(d).

The answer is yes. Section 180.407(c) establishes periodic inspection and test requirements for specification cargo tanks. Generally, an MC 330 or MC 331 specification cargo tank must undergo a visual external inspection each year. Section 180.407(d) requires a visual internal inspection in place of the visual external inspection for insulated cargo tanks, except for MC 330 and MC 331 cargo tanks. However, for cargo tanks, including MC 330 and MC 331 cargo tanks, for which an internal visual inspection is precluded, either because the tank has an internal lining or coating or is not equipped with a manhole, § 180.407(d) requires the tank to be pressure tested in accordance with § 180.407(c) and (g). Consistent with § 180.407(d), the chart in § 180.407(c) indicates that, except for MC 338 cargo tanks, all cargo tanks that are insulated with no manhole or are insulated and lined must be pressure tested annually.

You are correct that, even where insulation precludes a visual external inspection of the tank shell, a visual external inspection of a cargo tank's piping, valves, gaskets, manholes, emergency devices, remote closures, and all major appurtenances and structural attachments must be conducted in accordance with § 180.407(d)(2). The cargo tank must be marked as specified in § 180.415 to indicate successful completion of the visual external inspection.

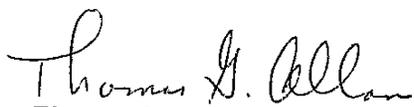


000336

180.407

I hope this information is helpful. If you have further questions, please do not hesitate to contact this office.

Sincerely,

Handwritten signature of Thomas G. Allan in cursive script.

Thomas G. Allan

Senior Transportation Regulations Specialist

Office of Hazardous Materials Standards



NATIONAL TANK TRUCK CARRIERS, INC.

THE NATIONAL ORGANIZATION SERVING THE FOR-HIRE TANK TRUCK INDUSTRY

CLIFFORD J. HARVISON
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Gorsky
\$180.407(d)
Cargo tanks

00-0336

November 29, 2000

Mr. Edward Mazzullo
Office of Hazardous Materials Standards
Research and Special Programs Administration
U. S. Department of Transportation
Washington D.C. 20590

Dear Mr. Mazzullo:

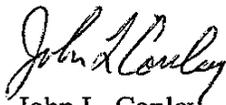
We would appreciate an interpretation of the Hazardous Materials Regulations in Part 180.407 (d) which reads as follows:

(d) *External visual inspection and testing.* (1) Where insulation precludes external visual inspection, the cargo tank, other than an MC330 or MC331 cargo tank, must be given a visual internal inspection in accordance with section 180.407(e). The tank must be hydrostatically or pneumatically tested in accordance with section 180.407 (c) and (g) where

Does an insulated MC330 or MC331 cargo tank have to be hydrostatically or pneumatically tested? It is clear that there is no requirement for an internal inspection, but "The tank" in the second sentence is not clear whether it applies to all tanks or tanks except MC330/331 tanks. We have received different interpretations from the field, so would appreciate your guidance. We do believe that other parts of the external visual inspection must be conducted and the tank marked with a "V."

Thank you for your assistance.

Sincerely,


John L. Conley
Vice President