



U.S. Department  
of Transportation  
**Research and  
Special Programs  
Administration**

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

OCT 12 2001

Mr. A. S. Pitts  
Surveyor  
Lloyd's Register of Shipping  
UK Plan Appraisal  
Industry Operations  
71 Fenchurch Street  
London EC3M 4BS  
United Kingdom

Ref. No. 01-0175

Dear Mr. Pitts:

This responds to your letter requesting clarification of the design requirements for DOT Specification 51 portable tanks under the U.S. Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you inquire if a beam-type portable tank, permanently mounted to full framework at each end, conforms to the mounting requirements in § 178.245-1(d)(4)(i).

The answer is no. Under § 178.245-1(d)(4)(i), a DOT Specification 51 portable tank must be permanently mounted in a full framework for containerized transport. Because there are no longitudinal members between the end frames in your design, it does not satisfy this requirement.

You may wish to consider submitting your design for approval as part of an exemption application under § 107.105 of the HMR.

I trust this satisfies your inquiry. Please contact us if we can be of further assistance.

Sincerely,



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



010175

178.245-1



**FAX MESSAGE**

REPLY CATEGORY:  
 URGENT  ACCELERATED  ROUTINE

Lloyd's Register of Shipping  
UK Plan Appraisal  
Industry Operations  
71 Fenchurch Street  
London EC3M 4BS  
Telephone + 44 207 423 2729  
Fax + 44 207 488 4796

*Stevens*

*§178.245-1*

*(d)(4)(i)*

*Portable Tanks*

LLOYD'S REGISTER OF SHIPPING, REGISTERED OFFICE:  
71 FENCHURCH STREET, LONDON EC3M 4BS

*01-0175*

TO: <b>US DOT</b> Director of Office of Standards Attn.: Mr. Edward Mazullo	FAX NO: <b>+ 00 1 202 366 3753</b>	DATE: <b>11 July 2001</b>
YOUR REF:	PAGES: <b>1 of 1</b>	PLEASE REPLY TO FAX NO:
SUBJECT: <b>CFR49 US DOT SPEC. 51</b> <b>TANK CONTAINER WITH BOTTOM DISCHARGE CONNECTION.</b>	OUR REF: <b>UKPA/IO/0008/O-0053</b>	

Dear Mr. Mazzullo,

1. Please could you assist with the following clarification.
2. With reference to US DOT CFR49 178.245-1(d)(4)(i); does a beam-type tank container permanently mounted to full framework at each end giving protection to the bottom discharge connection, but with no longitudinal framework members between the end frames, satisfy the intent of 178.245-1(d)(4)(i)?
3. Thank you in advance for your assistance in this matter, and your urgent consideration would be most appreciated.

Regards,

A. S. Pitts  
Surveyor  
Lloyd's Register UK Plan Appraisal Industry Operations

Tel. + 00 44 207 423 2729  
Fax: + 00 44 207 488 4796  
E-Mail [andrew.pitts@lr.org](mailto:andrew.pitts@lr.org)