



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

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

NOV 15 2001

Mr. Howard Marks  
Manager, Occupational & Environmental Health  
Koch Materials Company  
Post Office Box 2338  
Wichita, KS 67201-2338

Ref. No. 01-0269

Dear Mr. Marks:

This is in response to your October 17, 2001 letter and conversation with Diane LaValle of my staff concerning attendance requirements for tank cars under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you asked to confirm that the HMR do not require attendance when heating a tank car, prior to and not associated with the unloading process, by using a steaming device that is not interconnected with or part of the unloading process, with the manway opening slightly open to relieve any potential pressure.

This clarification is correct. When a tank car is connected to a steaming device that is not interconnected with or part of the unloading process or if the steaming process is conducted with all valves or manways closed, attendance is not required.

I hope this satisfies your request.

Sincerely,

Delmer F. Billings  
Chief, Standards Development  
Office of Hazardous Materials Standards



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174.67



KOCH MATERIALS COMPANY

17 October 2001

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Office of Hazardous Materials Standards  
US Department of Transportation  
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Dear Mr. Allan:

Per my verbal conversation yesterday morning with Diane LaValle at the Haz Mat Info Center, who in turn spoke with you, Koch Materials Company requests confirmation of an 18 February 2000 letter from you regarding Section 174.67 of the HMR (Ref. No. 99-0301). According to that letter, "... when a tank car is connected to a steaming device that is not interconnected with or part of the unloading process ... attendance is not required." The written confirmation we are requesting regards opening and blocking a manway while steaming a tank car that is not associated with the unloading process.

As a matter of background: materials originally shipped as "Elevated Temperature Liquid" may cool during extended travel time such that a tank car must be re-heated, prior to the unloading process, using a steaming device (not interconnected with or part of the unloading process). This returns the liquid to the original loading temperature. Note that during the steaming process, the manway would be slightly opened ( $\sim < 1$  inch) and blocked to relieve any pressure. This venting process significantly reduces any potential thermal hazard that may be associated once the unloading process is eventually initiated.

Based on your verbal interpretation, Koch Materials Company appreciates written confirmation that the HMR does not require attendance when heating a tank car, prior to and not associated with the unloading process, by using a steaming device (not interconnected with or part of the unloading process) and blocking slightly open the manway to relieve any potential pressure.

Greatly appreciate your expedited review. If you require further information, please do not hesitate to contact me at the above telephone number.

Regards,



Howard Marks

Manager, Occupational & Environmental Health