



U.S. Department  
of Transportation

**Pipeline and  
Hazardous Materials Safety  
Administration**

MAY -9 2006

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

Mr. Don Lampshire  
President  
Gas Service and supply  
3396 Swan Lake Road  
Bossier City, LA 71111

Ref. No. 06-0081

Dear Mr. Lampshire:

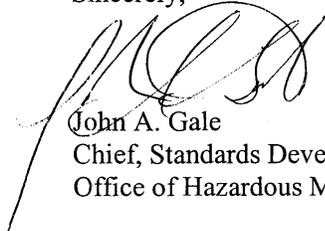
This responds to your April 4, 2006 letter requesting clarification on the shipment of meter provers under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if your volumetric provers are excepted from any packaging requirements under the HMR.

According to your letter, your company manufactures volumetric provers used to calibrate meter deliveries of gasoline, diesel, or propane. When calibrations are completed, all the liquid from the volumetric provers is transferred back to the customer storage tank. The provers are transported with residual vapors (no liquid) from the product previously transferred during the calibration. You ask if your meter provers are excepted from any packaging requirements under the HMR.

The answer is yes. Section 173.5a provides requirements for the shipment of meter provers. Section 173.5a(b)(2) excepts meter provers from the specification packaging requirements in Part 178 of the HMR provided the provisions in § 173.5a (b)(2)(i-v) are met.

I hope this answers your inquiry.

Sincerely,

  
John A. Gale  
Chief, Standards Development  
Office of Hazardous Materials Standards



060081

173.5a (b)(2)  
173.29

**Drakeford, Carolyn <PHMSA>**

**From:** Gorsky, Susan <PHMSA>  
**Sent:** Tuesday, April 04, 2006 7:52 AM  
**To:** Drakeford, Carolyn <PHMSA>  
**Subject:** FW:  
**Importance:** High

Boothe 173.52  
§ 173.29  
Residue/ Empty Packagings  
06-0081

One for the interp data base. Thanks.

Susan

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**From:** Don Lampshire [mailto:sales@gssprovers.com]  
**Sent:** Thursday, March 30, 2006 5:51 PM  
**To:** Shelton, Danny <FMCSA>  
**Subject:**  
**Importance:** High

Help!!! please provide me with an interpretation on the following-  
Gas Service and Supply is a manufacturer of volumetric provers. This particular group of provers are used to calibrate meter deliveries of either gasoline, diesel, or propane liquids. The gasoline and diesel provers are always equipped with storage that can range from the smallest 5 gallons to the largest 1000 gallons. The storage part of these provers are use for the transfer of liquid at the facility where the meter calibrations are being done. When the calibrations are finished, all the liquid is transferred back to the customer storage. The provers in question would be traveling on interstate and intrastate with residual vapors (no liquid) from the product you had just transferred during the calibration. Would this material of trade be exempt from any packaging (DOT) requirements?

Best Regards,  
Don Lampshire  
President  
Gas Service and Supply  
3396 Swan Lake Rd  
Bossier City, LA 71111  
318-742-5881 phone  
318-747-3425 fax  
website: [www.gssprovers.com](http://www.gssprovers.com)  
email: [sales@gssprovers.com](mailto:sales@gssprovers.com)

173.19  
173.50 (mechanical displacement meter provers)

→ volumetric meter provers

4/4/2006