



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety Administration**

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

OCT 5 2006

Ms. Nathalie Doyon  
Supervac 2000  
1043 Rue Renault  
St-Jean-Chrysostome, Qc G6Z1B6

Ref. No. 06-0160

Dear Ms. Doyon:

This responds to your fax dated July 14, 2006 requesting clarification on tank outlets for cargo tank motor vehicles in §178.345-11(b)(2) of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if a double acting valve driven by a self-closing air valve at the top of the tank meets the provisions of §178.345-11(b)(2).

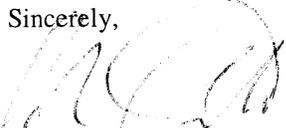
According to your fax, and as a follow up question to your first response from us on this subject dated July 11, 2006 under Ref. No. 06-0035, your modified diagram shows a valve that is not self-closing, but utilizes a double acting valve driven by a self-closing air valve. You ask for review of your modified diagram regarding compliance with provisions in §178.345-11(b)(2).

Section 178.345-11(a) requires cargo tank outlets, closures, and associated piping to be protected in accordance with §178.345-8. In addition, §178-345-11(b)(1) requires each cargo tank loading/unloading outlet be equipped with an internal self-closing stop-valve, or alternatively, with an external stop-valve located as close as practicable to the cargo tank wall. Each loading/unloading outlet must be fitted with a self-closing system capable of closing all such outlets in an emergency within 30 seconds of actuation. During normal operations the outlets may be closed manually. Under §178.345-11(b)(2), bottom loading outlets that discharge lading into the cargo tank through fixed internal piping above the maximum liquid level of the cargo tank need not be equipped with a self-closing system.

It is the opinion of this Office that the valve depicted in the diagram accompanying your letter does conform to §178.345-11(b)(2) provided it is connected to the emergency valve and closes the top of the tank.

I hope this answers your inquiry.

Sincerely,

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



060160

178.345-11(b)(2)



Boothe  
§ 178.345-11(b)(2)  
Cargo Tanks  
06-0160

FAX TRANSMISSION

<b>To:</b> Mrs. Deborah Boothe and/or Mr. John A. Gale Hazardous Materials	<b>Phone:</b> (202) 366-4545 <b>Fax :</b> (202) 366-3012
<b>From:</b> Nathalie Doyon Supervac 2000 1043, rue Renault, St-Jean-Chrysostome, Qc G6Z 1B6	<b>Phone:</b> (418) 839-5702 <b>Fax :</b> (418) 839-1816
<b>Object:</b> Following your letter	<b>Date :</b> July 14, 2006

We are sending you 2 pages including this covering page.  
If you did not receive that number of pages, please contact us at the following telephone no (418) 839-5702

MESSAGE

Good day:

We received your letter dated July 11<sup>th</sup> 2006, where you were mentioning that *the manual double action valve depicted in the diagram we provided does not conform to 178.345-11*. Following that, we would like to present to you another way that we could do things in order to be conform.

As you will notice on the attached modified sketch, the valve still won't be a self closing valve but we will use a double acting valve driven by a self closing air valve (see drawing).

We would appreciate to have an answer from you as soon as possible. If you need more details concerning the sketch or any other information, please don't hesitate to contact us.

Once again, thank you for your collaboration

Regards

Nathalie  
Supervac 2000  
[ndoyon@supervac2000.com](mailto:ndoyon@supervac2000.com)

☺ Have a nice day ☺