



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

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

JUL 16 2003

Mr. Darwin D. Garvin
Transportation Safety Compliance Service
40085 C. R. 7
Caldwell, Ohio 43724

Ref No.: 03-0101

Dear Mr. Garvin:

This is in response to your letter and your telephone conversation with Mr. Darral Relerford, of the Office of Hazardous Materials Standards, concerning the transportation of sulfuric acid and the requirements for inspectors of cargo tank motor vehicles under the Hazardous Materials Regulations (HMR; 49 C.R. Parts 171-180). Your questions are paraphrased and answered as follows:

- Q1. How must a cargo tank be protected when transporting sulfuric acid in concentrations over 65.25 percent?
- A1. As stated in § 173.24(e), it is the responsibility of any person who offers a hazardous material for transportation to ensure that the packaging is compatible with its lading. The need for corrosion protection, if any, depends on the corrosion rate that a particular sulfuric acid concentration would have on the cargo tank material of construction. As an example, high strength sulfuric acid reacts with carbon steel at a very slow rate.
- Q2. Is the option for "corrosive allowance" only for concentration of sulfuric acid up to 65.25 percent?
- A2. Any cargo tank may be built with corrosion allowance. However, Special Provision B15, that applies to sulfuric acid in concentrations up to 51 percent, and Special Provision B84, that applies to sulfuric acid in concentrations up to 65.25 percent, require the use of a cargo tank protected with non-metallic lining impervious to the lading or with a suitable corrosion allowance. Also see § 178.345-3(c).
- Q3. May a cargo tank motor vehicle manufacturer and repair facility that has authorization for the use of the "R" stamp issued by the National Board of Boiler and Pressure Vessel Inspectors (National Board) and the American Society of Mechanical Engineers (ASME) Certificate of Authorization "U" stamp register five separate facilities (i. e., headquarters and four field branches) under the same Department of Transportation (DOT) Registration Number?



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- A3. The answer is yes, if the branch offices are legitimate extensions of the headquarter's facility and the cargo tank manufacturing and repair work at all five facilities is performed under the supervision of personnel who are located at and dispatched from the same facility. All registration records must be maintained and made available for inspection at the dispatching facility and each facility where work is performed.

However, if the manufacturing or repair work is performed at and certified by personnel stationed at the headquarter's facility or a branch facility, then each facility where the work is performed must be registered and have a separate registration number as stated in §§ 107.502(e) and 107.503(a)(2). In addition the registration application must include, a statement indicating whether the facility uses mobile testing/inspection equipment to perform inspections, tests, or repairs at a location other than the address listed in paragraph (a) (2) of § 107.503.

- Q4. May an employee or shop personnel who is not registered as an inspector perform inspection and testing of cargo tanks?

A4. Yes, a person who is not a Registered Inspector may perform -

- a) the inspections and tests listed in § 180.407(c) under the direct supervision of a person who is a Registered Inspector. All inspection and test reports must be certified by the Registered Inspector. See § 180.409(a).
- b) the annual external visual inspections and leakage tests on a cargo tank motor vehicle with a capacity of less than 13,250 L (3,500 gallons) used exclusively for flammable liquid petroleum fuels if the vehicle is owned or operated by that person. The person performing the inspections and tests or certifying the reports must have the knowledge and ability to perform such inspections and tests and must be registered with the Department under § 107.502. See § 180.409(b).
- c) the annual external visual inspections and leakage tests on a permanently mounted non-bulk tank for petroleum products as authorized by § 173.8(c) if the vehicle is owned or operated by that person. The person performing the inspections and tests must have the knowledge and ability to perform such inspections and tests. However, the person performing the inspections and tests and the person certifying the reports, if different, are not required to register with the Department under § 107.502. See § 180.409(c).
- d) a portion of the hydrostatic or pneumatic pressure test as set forth in § 180.407(g)(1)(viii) and (ix), respectively. The person must be familiar with the cargo tank, and trained and experienced in the use of the inspection and testing equipment used. The person's employer must be registered with the Department and must retain a copy of the tester's qualifications in the records. See § 180.409(d).

Q5. May an employee who is not a registered inspector sign the inspection report?

A5. See response A4.

I hope this information is helpful. Please contact us if you require additional assistance

Sincerely,



Susan Gorsky
Senior Transportation Regulations Specialist
Office of Hazardous Materials Standards



DARWIN D. GARVIN, INC.
TRANSPORTATION SAFETY
COMPLIANCE SERVICE



40085 C.R. 7
CALDWELL, OHIO 43724
EMAIL: DARWINGARVIN@AOL.COM

(740) 732-0265
FAX (740) 732-0265
CELL (863) 221-7874

March 9, 2003

Research and Special Programs Administration
Associate Administrator for Hazardous Materials Safety
Office of Hazardous Materials Standards DHM-11
400 7th Street, S. W.
Washington, D. C. 20590

Referford
§107.502
§180.409
Registration
03-0101

Dear Sir/Ma'am:

This letter is for the purpose of obtaining information concerning the transportation of sulfuric acid and the requirements for inspectors of cargo tanks.

✓Q-1. Sulfuric acid with more than 51 percent acid. Special provision B84 states, "packagings must be protected with non-metallic linings impervious to the lading or have a suitable corrosion allowance for sulfuric acid or spent sulfuric acid in concentration up to 65.25 percent." How must a cargo tank be protected when transporting sulfuric acid with a concentration of over 65.25 percent?

✓Q-2. Is the option for "corrosion allowance" only for concentrations up to 65.25 percent?

Subpart F - Registration of cargo tank and cargo tank motor vehicle manufacturers and repairers and cargo tank motor vehicle assemblers.

Q-3. May a cargo tank manufacturing and repair facility that has authorization for the use of the "R" stamp and the "U" stamp operate satellite locations under the same authorization?

Q-4. Part 107, Subject F, Section 107.502(b) states, "****a person employed as an inspector or design certifying engineer is considered to be registered if the person's employer is registered."

Section 180.409(a) (1) states, "Be registered with the Department in accordance with Part 107, Subpart F of this Chapter, and****"

A motor carrier is registered as required by 107.502. May an employee, shop personnel, that is not otherwise registered as an inspector perform inspection and test of cargo tanks under 180.409?

Q-5. May an employee that is not a registered inspector sign the inspection form if he performs certain tests?

Your timely response would be appreciated.

Sincerely,

A handwritten signature in cursive script that reads "Darwin D. Garvin".

Darwin D. Garvin