



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

FEB 25 2008

1200 New Jersey Avenue, SE
Washington, D.C. 20590

Mr. David Gluntz
Packaging Applications for Dangerous Goods, LLC
3583 Blackbottom Court,
Columbus, OH 43221-4501

Ref. No. 07-0225

Dear Mr. Gluntz:

This responds to your November 28, 2007 email and subsequent telephone conversations requesting clarification of the general design requirements for DOT portable tanks under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask whether installing a "bleed off valve" assembly as a component of the pressure relief system for a DOT 51 portable tank is prohibited and requires a special permit to install.

Your enclosed sketch indicates the bleed off valve assembly would be installed between the pressure gauge/tell-tale indicator and the pressure relief device to allow for the safe removal of vapors trapped in the void space should a leak occur in the frangible disc.

It does not appear that the installation of the bleed off valve assembly involves a modification of the DOT 51 portable tank that would invalidate the ASME U stamp. Therefore, the bleed off valve assembly installed as a component of the pressure relief system as shown in your sketch is not prohibited and does not require a special permit to install. However, we highly recommend the use of good engineering practices (e.g., a leakage test) when installing the assembly. A report of the installment and any testing must be made a part of the records for the portable tank.

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

Sincerely,

Hattie L. Mitchell
Chief, Regulatory Review and Reinvention.
Office of Hazardous Materials Standards

§ 178.275(g)(3)

Portable Tanks
02 - 0225

Drakeford, Carolyn <PHMSA>

From: INFOCNTR <PHMSA>
Sent: Wednesday, November 28, 2007 11:51 AM
To: Drakeford, Carolyn <PHMSA>
Subject: FW: Letter of Interpretation - 49 CFR 178.275(g)(3)
Attachments: 49 CFR 178-275-g-3 bleeder concept sketch spec 51 11-27-07.doc

Carolyn,

Could you take care of processing this as a formal request for interpretation? Thanks!

Erin

From: David Gluntz [mailto:davidgluntz@padgllc.com]
Sent: Wednesday, November 28, 2007 11:20 AM
To: INFOCNTR <PHMSA>
Subject: Letter of Interpretation - 49 CFR 178.275(g)(3)

Priority: Speedy Reply Please

Reference: 49 CFR §175.278(g)(3) and attached sketch with Bleed off valve concept

Dear Mr. Mazzullo,

First of all, please let me apologize for asking for a speedy reply. The company proposing to transport a regulated material within a Specification 51 portable tank is under pressure from its customer for a definitive answer regarding the appropriateness of the referenced "Bleed off" assembly (sketch item D) in the attached sketch. The concern is as follows: the Pressure Gauge/Tell-Tale Indicator (sketch item B) is required by §178.275(g)(3) to indicate if the Frangible Disc (sketch item A) leaked. Consequently, if there was a leak, there must be a safe way to "bleed off" the vapors between the Frangible Disc (sketch item A) and the Pressure Relief Device (sketch item C) into a neutralizing agent. The "bleed off" assembly (sketch item D) would permit a hose or similar type plumbing to be attached, allowing the trapped material to flow into a neutralizing agent. When the "bleed off" is completed and the leak repaired, the "bleed off" valve would be closed, the hose would be removed and the threaded cap replaced. The hose would **not** be a permanent, in transport, component of the Spec 51. However, the "bleed off valve" assembly **would be** a permanent, in transport, component of the Spec 51's pressure relief system.

Second, yesterday Mr. Stan Staniszewski of the DOT's Office of Hazardous Materials Technology and I discussed adding the "bleed off" assembly to a Specification 51's pressure relief system. Mr. Staniszewski said that adding a "bleed off valve" between the frangible disc and the pressure relief device on a Specification 51 portable tank would be acceptable. Obviously, after the "bleed off valve" assembly were installed, a leakproofness test would be necessary. Mr. Staniszewski also mentioned that possibly a special permit should be applied for before proceeding.

Third, I have been unable to find a provision in the 49 CFR which would prohibit the permanent installation of the "bleed off" valve assembly (sketch item D).

Fourth, Mr. Staniszewski said that if a written, DOT interpretation was needed, I was to contact your

11/28/2007

department. Therefore, I am asking for an interpretative letter confirming Mr. Staniszewski and my belief that a "bleed off vent" assembly can be added to the 49 CFR 178.275(g)(3) required pressure relief as sketched without violating the DOT's regulations for a Specification 51 portable tank. Additionally, I do not believe that a special permit is necessary as the Specification 51's shell is not directly being affected.

I am looking forward to hearing from your office and I thank you in advance for your help.

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49 CFR §178.275(g)(3) Concept Sketch - November 27, 2007

Bleed off valve

Sketch has no scale and is for concept discussion/reference only.

A = Frangible Disc

B = Pressure Gauge/Tell-Tale Indicator

C = Pressure Relief Device

D = Thought of "Bleed off" assembly consisting of a nipple to a valve to nipple to a threaded cap

