



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

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

JUL 22 2014

Mr. Danny Shelton
President
HazMat Resources, Inc.
124 Rainbow Drive, Suite 2471
Livingston, TX 77399-1024

Ref. No.: 14-0110

Dear Mr. Shelton,

This is in response to your email dated May 27, 2014, requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) relating to the visual inspection of cargo tanks fitted with an external vinyl wrap.

In your letter you describe a scenario in which cargo tanks are wrapped in vinyl for advertising and or aesthetic purposes. It is your understanding that because the tank exterior is covered by the vinyl wrap, the tank cannot be completely inspected during an external visual inspection in accordance with § 180.407(d) and as such, would be subject to an annual internal visual inspection in accordance with § 180.407(e). Specifically, you ask if an external visual inspection may be performed on a vinyl wrapped cargo tank; or if a combination external and internal inspection may be performed to account for areas of the cargo tank that are covered by the vinyl wrap and not readily visible from the exterior.

Section 180.407(c) requires all specification cargo tanks to have an external visual inspection at least once each year. As provided in § 180.407(d)(1), if external visual inspection is precluded because any part of the cargo tank wall is externally lined, coated, or designed to prevent an external visual inspection, those areas of the cargo tank must be internally inspected. Therefore, in the scenario you describe where a vinyl wrap precludes an external inspection of certain areas of the cargo tank, the areas covered by vinyl wrap that prevent external inspection must be internally inspected in conjunction with the external visual inspection for the remaining areas of the cargo tank.

I trust this information is helpful. If you have further questions, please do not hesitate to contact this office.

Sincerely,

Shane C. Kelley
Acting International Standards Coordinator
Standards and Rulemaking Division

Drakeford, Carolyn (PHMSA)

Wierce
\$ 180.405
\$ 180.406

From: Betts, Charles (PHMSA)
Sent: Tuesday, May 27, 2014 1:19 PM
To: Drakeford, Carolyn (PHMSA)
Cc: Stevens, Michael (PHMSA); Foster, Glenn (PHMSA)
Subject: Fw: External Visual Inspection of a wrapped cargo tank

Cargo Tanks
14-0110

Carolyn-

Please log and assign for response. This letter should be assigned to Michael Stevens.

Thanks

From: Danny Shelton [mailto:shelton10104@gmail.com]
Sent: Tuesday, May 27, 2014 01:10 PM Eastern Standard Time
To: Betts, Charles (PHMSA)
Cc: Stevens, Michael (PHMSA)
Subject: External Visual Inspection of a wrapped cargo tank

Good morning Mr. Betts, I have another request for interpretation. A lot of companies are wrapping their cargo tanks with a vinyl wrapped for advertising and other aesthetics. I have spoken with various folks from the DOT and it is their opinion, and I happen to agree, that because you cannot inspect the exterior of the tank during an external visual that you must do an internal every year. If the tank is covered you cannot inspect the welds for cracks and you cannot inspect the shell for pitting, just to name a few. So the question is this: Can you perform an external visual inspection on a wrapped cargo tank or must you do an external visual inspection on those items that you can inspect externally and perform an internal inspection annually on the remaining items such cracks in welds and pitting of the shell?

Thank you in advance for your response.

Regards

P.S. I sent this to Mike Stevens also because him and I actually inspected wrapped cargo tanks at the NTTCC show in Houston and we came up with this question.

Danny Shelton
HazMat Resources, Inc.
President

(423) 863-2252 Work
(423) 863-2252 Mobile
Shelton10104@gmail.com
124 Rainbow Drive, Suite 2471
Livingston, TX 77399-1024

