



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

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

APR 26 2016

Edwin Jackson
Petroleum Fleet Specialists
PO Box 1024
Marshal, VA 20116

Ref. No. 15-0221

Dear Mr. Jackson:

This responds to your November 6, 2015 email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the visual inspection of cargo tanks as it relates to vinyl wrapping. Specifically, you ask whether a vinyl decal is considered a lining or coating as provided in § 180.407(d)(1).

A vinyl decal is not considered a lining or coating, but may restrict a proper external visual inspection from being performed. 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. Thus, if the outside of a cargo tank is covered with a vinyl decal that prevents the inspector from performing an external visual inspection (e.g., inspecting welds for cracks, shell for pitting, etc.), the cargo tank requires an internal visual inspection for the affected areas, in conjunction with an external visual inspection. However, if the decal still allows for an external visual inspection, an internal visual inspection would not be required.

I trust this satisfies your inquiry. Please contact us if we can be of further assistance.

Sincerely,

Dirk Der Kinderen
Chief, Standards Development Branch
Standards and Rulemaking Division

Ciccarone
§ 180.407(d)(1)
Cargo Tanks
15-0221

Dodd, Alice (PHMSA)

From: Geller, Shelby CTR (PHMSA)
Sent: Monday, November 09, 2015 1:25 PM
To: Hazmat Interps
Subject: FW: Formal interpretation of Ref.No.: 14-0110

Dear Shante and Alice,

Below is a request for a formal letter of interpretation. Mr. Jackson spoke with Jordan Rivera in the HMIC. His mailing address is:

Petroleum Fleet Specialist
PO BOX 1024
Marshal, VA 20116

Thanks,
Shelby

From: Edwin Jackson [<mailto:edwin@petrofleet.com>]
Sent: Friday, November 06, 2015 3:12 PM
To: PHMSA HM InfoCenter
Subject: Formal interpretation of Ref.No.: 14-0110

I would like to have a recorded clarification of a response with Ref. No.: 14-0110.

The question specifically was about wrapped tanks being covered by vinyl stickers not allowing the shell to be visibly inspected from the outside requiring an internal inspection.

The reply used verbiage from 180.407(d)(1) which says if ANY piece of the shell is lined or coated so that you can not see the shell it needs to be internally inspected.

So I guess the main question now, is a vinyl decal considered a lining or coating? If so pretty much 90% of all 306 & 406 tanks would need to be internally inspected due to having some type of decal on it. If you want to get technical that would mean a stick on placard would require an internal inspection or removing the placard to look at the shell under it.

This was brought to my attention by one of your Hazmat Material Specialist and he asked me to get a clarification.

For what it is worth I do not agree with this. My experience removing decals, I would say if anything it is a protective coating for at least corrosion. You can see any gouge or dent under the vinyl decal. And for the most part any crack you find in a weld is going to be leaking and that will show up just as much if not worse from a melting decal. Further more an internal inspection is not going to show a gouge on the outside of the shell only a dent.

A structural crack say at an outrigger pad would be covered by a wrap but an internal would not find it either. Another question would be if you are required to do an internal to inspect the shell that is covered by the decal are you required to look at the baffles or any other internal components that would only be inspected during a 5 year?

If it is decided that a vinyl decal is considered a lining or coating this changes everything and it needs to be known.

Thank you for your help in this matter

Sincerely,

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Edwin Jackson

Petroleum Fleet Specialists

540.222.1506