



U.S. Department
of Transportation

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

**Pipeline and
Hazardous Materials Safety
Administration**

JUN 15 2006

Mr. Bradley W. Clayton
Senior Trooper
Utah Highway Patrol
Vehicle Safety Section
5500 West Amelia Earhart Dr.
Suite 360
Salt Lake City, Utah 84116

Ref. No. 06-0116

Dear Mr. Clayton:

This responds to your letter requesting clarification of the cargo tank test date markings under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask whether the test date marking requirements in § 180.415(b)(2) may be satisfied by placing them on a metal plate bolted to an appurtenance such as a hose tube or a fender.

As you are aware, § 180.415(b)(2) requires test date markings on a cargo tank to be placed near the specification plate or anywhere on the front head. The intent is to affix these required markings to the cargo tank body. Therefore, the scenario you describe does not satisfy that requirement of the HMR.

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

Sincerely,

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



060116

180.415 (b)



Utah Highway Patrol

COLONEL SCOTT T. DUNCAN
Superintendent

Stevens
§ 180.415 (b)
Cargo Tanks
06-0116

State of Utah

JON M. HUNTSMAN, JR.
Governor

GARY R. HERBERT
Lieutenant Governor

To: U.S. Department of Transportation
Research and Special Programs Administration
Office of Hazardous Materials Standards
400 Seventh St., S.W.
Washington, D.C. 20590

10 April, 2006

From: Senior Trooper Bradley W. Clayton
Utah Highway Patrol
5500 West Amelia Earhart Dr. Suite 360
Salt Lake City, Utah 84116

Topic: Cargo Tank Test Date Markings

Section 180.415(b) states; "**Each cargo tank** must be durably and legibly marked, in English, with the date (month and year) and the type of test or inspection performed, subject to the following provisions:

Section 180.415(b)(2) states; "The markings must be in letters and numbers at least 32 mm (1.25 inches) high, **near the specification plate or anywhere on the front head.**

Does the term "**Each cargo tank**" and "**near the specification plate or anywhere on the front head**" mean the marking must be on the tank shell itself or are the test date markings allowed to be displayed on a metal plate bolted to a cargo tank appurtenance such as a hose tube or fender? (This metal plate could easily be removed by bolts and affixed to a different cargo tank)

Thank you for considering this question

Sincerely

Bradley W. Clayton
Senior Trooper
Utah Highway Patrol
Vehicle Safety Section

