U.S. Department
of Transportation
**Pipeline and
Hazardous Materials Safety
Administration**

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

JUL 11 2006

Ms. Nathalie Doyon
Supervac 2000, Inc.
1043 Rue Renault
St-Jean-Chrysostome, Qc G6Z1B6

Ref. No.06-0035

Dear Ms. Doyon:

This responds to your fax dated February 13, 2006 requesting clarification on tank outlets for cargo tank motor vehicles in § 178.345-11(b)(2) of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if a manual double action valve at the top of the tank meets the provisions of §178.345-11(b)(2).

According to your fax and the additional diagram provided, your company manufactures vacuum equipment with a manual double action valve on the top of the tank. You want to use a manual double action valve on the top of the tank that is not connected to the emergency valve, and, does not close the top of the tank. You request confirmation on whether use of this manual double action valve would meet the provisions of § 178.345-11(b)(2).

Section 178.345-11(a) requires cargo tank outlets, closures and associated piping to be protected in accordance with §178.345-8. In addition, §178-345-11(b)(1) provisions require each cargo tank loading/unloading outlet be equipped with an internal self-closing stop-valve, or alternatively, with an external stop-valve located as close as practicable to the cargo tank wall. Each loading/unloading outlet must be fitted with a self-closing system capable of closing all such outlets in an emergency within 30 seconds of actuation. During normal operations the outlets may be closed manually. Under §178.345-11(b)(2), bottom loading outlets that discharge lading into the cargo tank through fixed internal piping above the maximum liquid level of the cargo tank need not be equipped with a self-closing system.

It is the opinion of this Office that the manual double action valve depicted in the diagram you provided does not conform to § 178.345-11 because it is not connected to

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178.345-11(b)(2)

the emergency valve and does not close the top of the tank. Section 178.345-11(b)(2) does not apply to your scenario.

I hope this answers your inquiry.

Sincerely,

John A. Gale
Chief, Standards Development
Office of Hazardous Materials Standards

Boothe
$178.345-11
Tank Outlets
06-0035

SUPERVAC 2000 inc.
Camions à pompe vacuum
Vacuum pump trucks

FAX TRANSMISSION

To:	Hazardous Materials	*Phone:* *Fax :*	(202) 366-4545 (202) 366-3753
From:	Nathalie Doyon Supervac 2000 1043, rue Renault, St-Jean-Chrysostome, Qc G6Z 1B6	*Phone:* *Fax :*	(418) 839-5702 (418) 839-1816
Object:	Request for clarification	Date : February 13, 2005	

We are sending you 1 pages including this covering page.
If you did not receive that number of pages, please contact us at the following telephone no (418) 839-5702

MESSAGE

Good day,

Two weeks ago we sent you the following fax:

"Our company is manufacturing Vacuum equipment and we would like to have some clarifications concerning "part 178 of the regulation binder (section 178.345-11 article B2).

We want to verify if we are o.k. thinking that the closing valve that goes on the boom of the equipment we are manufacturing and the suction valve would enter in this section of the regulation without having to add an automatically closing valve. We would have a double action valve.

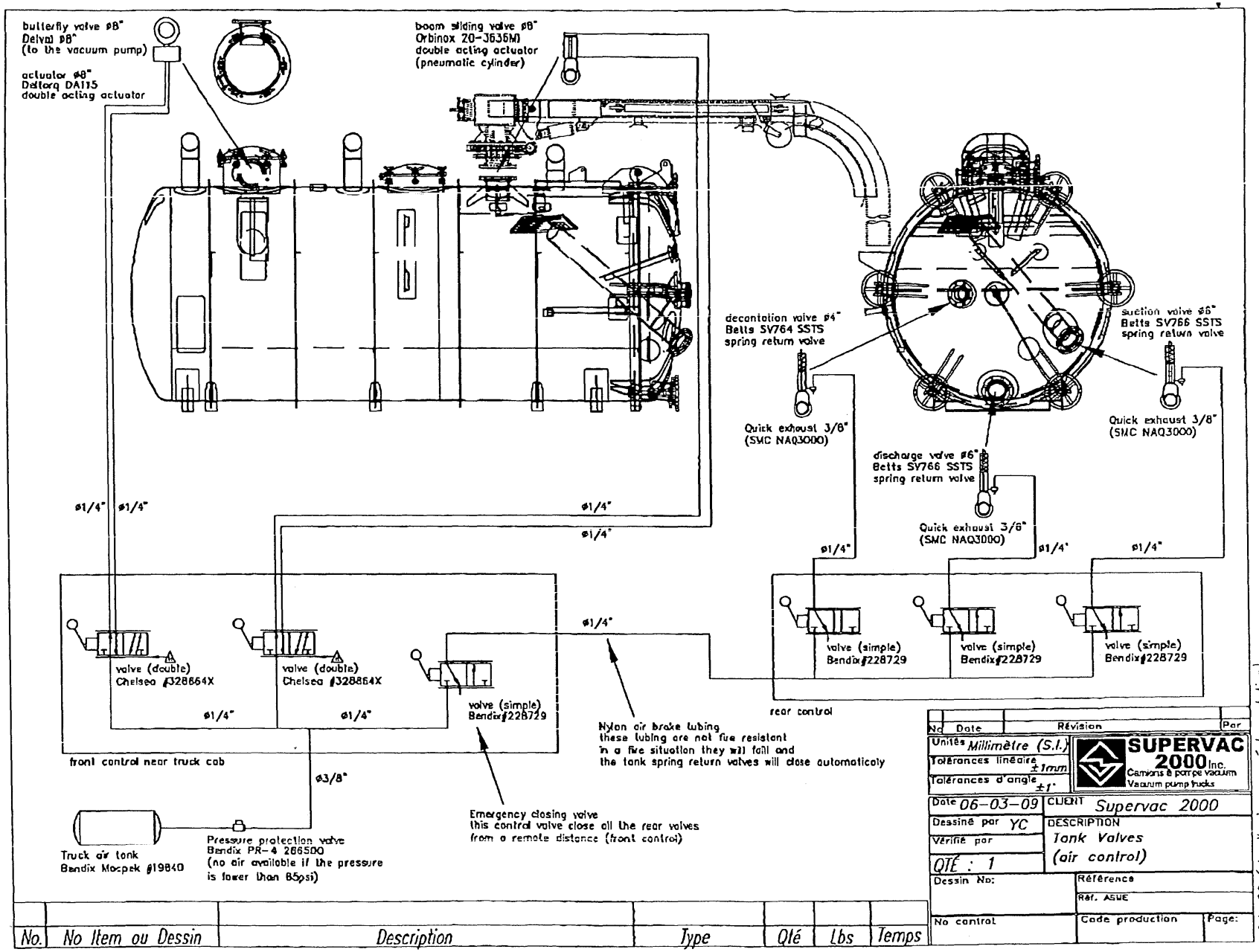
I hope my question is clear enough. If you need more information don't hesitate to contact me."

As we did not hear from you since, we thought that maybe you did not receive it. Following the reading of this fax, could you tell me if you are the right person that could give me an answer or will I have to contact somebody else. If you could come back to me I would very appreciate. You can reach me by e-mail at: ndoyon@supervac. Thank you for your help and collaboration.

Regards

Nathalie
Supervac 2000

Transmission effectuée par
Transmission executed by: _____ Date: _____ Heure/*Hour*:_____



SUPERVAC 2000 inc.
Camions à pompe vacuum
Vacuum pump trucks

FAX TRANSMISSION

To:	Mrs. Deborah Boothe Hazardous Materials	*Phone:* *Fax :*	(202) 366-4545 (202) 366-3012
From:	Nathalie Doyon Supervac 2000 1043, rue Renault, St-Jean-Chrysostome, Qc G6Z 1B6	*Phone:* *Fax :*	(418) 839-5702 (418) 839-1816

Object: Diagram — Date : March 9, 2006

We are sending you 2 pages including this covering page.
If you did not receive that number of pages, please contact us at the following telephone no (418) 839-5702

MESSAGE

Good afternoon,

Following our discussion, please find the explanatory diagram of the valve we discussed this morning. If you rather receive it by e-mail, just send me your e-mail address and I will send it to you as soon as possible.

Thank you very much and if you need more details, you just have to call us.

Regards

Nathalie
Supervac 2000
ndoyon@supervac2000.com

Transmission effectuée par
Transmission executed by: _____ Date: _____ Heure/*Hour*:_____